Acceptance of the Otway Offshore Gas Victoria Offshore Project Proposal

Document No: A1188606

Date: Thursday, 17 April 2025

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1. On Thursday, 17 April 2025 I, Sue McCarrey, as the Chief Executive Officer (**CEO**) of the National Offshore Petroleum Safety and Environmental Management Authority (**NOPSEMA**), decided, pursuant to s 13(1)(a) of *the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023* (**Environment Regulations**), to accept the Otway Offshore Gas Victoria Offshore Project Proposal (Document No: V-1000-01-MP-0001, Revision 6, dated Wednesday, 2 April 2025) (**OPP**), as I was reasonably satisfied that the OPP met the criteria in s 13(4) of the Environment Regulations.

2. The decision to accept an OPP for the purposes of s 13 of the Environment Regulations is made by NOPSEMA. Pursuant to sub-s 666(2) of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (**OPGGS Act**), anything done by the CEO in the name of NOPSEMA is taken to have been done by NOPSEMA.

3. The OPP was submitted by Beach Energy (Operations) Limited (**proponent**) to enable the proponent to undertake the offshore project described in the OPP, which involves the production of petroleum resources in the Otway Basin, in offshore waters off Victoria. The petroleum activities that are part of the offshore project include drilling, installation, commissioning, production, and decommissioning of infrastructure. The offshore project ties into existing offshore petroleum infrastructure, which is operated by the proponent, to supply the Australian east coast domestic gas market via the Otway Gas Plant.

4. In this Statement of Reasons:

   a. When I refer to NOPSEMA having made a request, I am referring to a request made by me.

   b. When I refer to NOPSEMA having considered or having had regard to a matter, whether it be expressed in those words or similar phrasing, I am referring to a matter that I have considered or taken into account; and

   c. When I refer to NOPSEMA making a finding of fact or accepting a submission, I am referring to a finding made by me.

5. In making this decision, I have taken into account and accepted advice and recommendations from the assessment team within NOPSEMA. The assessment team comprised a Director, a Lead Assessor, and a team of Environment Specialists.

6. The assessment team scoped the assessment of the OPP in accordance with NOPSEMA's assessment policy and guidance material. The assessment scope consisted of:
   a. a general assessment of the OPP
   b. topic scope assessments comprising:
      i. matters protected under Part 3 of the *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**)
      ii. impacts to the socio-economic environment, with a focus on commercial fisheries
      iii. emissions and discharges (planned), with a focus on greenhouse gas emissions and discharges to the sea during drilling and construction activities.
7. All references to a section are to the Environment Regulations unless otherwise stated.
8. **Appendix A** provides definitions for terms used throughout my reasons, that I have not otherwise defined.

Background

9. On Monday, 11 September 2023, the proponent submitted the OPP to NOPSEMA in accordance with s 6 of the Environment Regulations.
10. I requested the proponent provide further written information under s 8(1) of the Environment Regulations on Tuesday, 10 October 2023. The proponent revised the OPP in response to this request and resubmitted the OPP on Friday, 22 December 2023.
11. I requested the proponent provide further written information under s 8(1) of the Environment Regulations on Wednesday, 17 January 2024. The proponent revised the OPP in response to this request and resubmitted the OPP on Friday, 16 February 2024.
12. On Thursday, 14 March 2024, I decided that:
    a. the OPP was suitable for publication because I was reasonably satisfied it met the criteria in sub-s 9(4) of the Environment Regulation; and
    b. a 63 day (nine week) public comment period was appropriate given the nature and scale of the offshore project.
13. On Monday, 18 March 2024 the public comment period commenced.
14. On Monday, 20 May 2024 the public comment period concluded.
15. On Friday, 21 June 2024 the proponent revised and resubmitted the OPP following the public comment period in accordance with s 11 of the Environment Regulations.
16. I requested the proponent provide further written information under s 12(1) of the Environment Regulations on Monday, 22 July 2024. The proponent revised the OPP in response to this request and resubmitted the OPP on Thursday, 31 October 2024.

17. I requested the proponent provide further written information under s 12(1) of the Environment Regulations on Friday, 29 November 2024. The proponent revised the OPP in response to this request and resubmitted the OPP on Friday, 7 March 2025.

18. I requested the proponent provide further written information under s 12(1) of the Environment Regulations on Tuesday, 1 April 2025. The proponent revised the OPP in response to this request and resubmitted the OPP on Wednesday, 2 April 2025.

Materials

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

Contents of the Offshore Project Proposal

20. Section 7 of the Environment Regulations sets out the required contents of an offshore project proposal.

21. I was satisfied that s 7 of the Environment Regulations was met, as I found:

    a. Section 1.2 of the OPP satisfies the requirements of sub-s 7(2)(a)

    b. Sections 3, 6, and 7 of the OPP satisfy the requirements of sub-s 7(2)(b)

    c. Sections 4, 6, and 7 of the OPP satisfy the requirements of sub-ss 7(2)(c), 7(2)(d), and 7(3)

    d. Section 6, 7, and 8 of the OPP satisfy the requirements of sub-s 7(2)(e)

    e. Section 3.9 of the OPP satisfies the requirements of sub-ss 7(2)(f)

    f. Sections 2, 6, 7, and 9 of the OPP satisfy the requirements of sub-s 7(4)

    g. Section 6, 7, and 8 of the OPP satisfy the requirements of sub-s 7(5).

Criteria for Acceptance of the Offshore Project Proposal

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

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

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

24. I found that the OPP adequately addressed comments given during the period for public comment because the OPP, at Appendix P:

    a. comprehensively summarised the eleven comments received during the public comment period, which after reviewing I was reasonably satisfied that all public comments were identified by the proponent.

    b. clearly identified the objections and claims made in the public comments about the offshore project or any activity that is part of the offshore project, which after reviewing I was reasonably satisfied the proponent had identified all claims or objections about the project or the activities that are part of the project.

    c. assessed the merits of each objection or claim identified within the public comments about the project or any activity that is part of the project and considered the facts, reasons, and evidence to support the conclusions of the assessment, which after reviewing I was reasonably satisfied that the proponent had adequately assessed the merits of each claim or objection.

    d. included a statement of the proponent's response to each objection or claim raised through public comment and suitable reasoning to support the response, which after reviewing I was reasonably satisfied adequately addressed the claim or objection

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

25. I was reasonably satisfied the proponent's responses to public comment have a basis in relevant facts, reasons, and evidence to adequately support the response to the objections and claims and, where applicable, present further information that has a basis in relevant facts and evidence from appropriate scientific literature with consideration to the nature and scale of the activities being proposed.

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

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

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

    a. clearly and logically describes the process by which the OPP evaluates environmental impacts and risks, which aligns with recognised environmental impact and risk management standards (e.g., AS/NZS ISO 31000:2018) (Section 5 of the OPP)

    b. applies the environmental risk management process described in Section 5 of the OPP consistently to the planned impacts and unplanned risks that may credibly arise because of the project

c. clearly describes the activities that are part of the project, including the spatial and temporal extent of these activities (Section 3 of the OPP)

d. identifies the environmental aspects of these activities and describes the pathways by which the aspects may cause an environmental impact (Sections 6 and 7 of the OPP)

e. describes the environment that may be affected by the aspects of the activities that are part of the project (Sections 4, 6, 7, and 8 of the OPP).

28. I found Section 3 of the OPP contained an adequate description of the offshore project which defines the scope and bounds of the offshore project. The description provided a sound basis for the proponent to evaluate all environmental impacts and risks, including the potential for cumulative impacts. This is because the OPP provided details on the petroleum activities, including their location, spatial extent, timing, and duration. Key activities that are part of the offshore project include:

a. Surveys to inform the design of the offshore project's activities, such as design of moorings for the mobile offshore drilling unit (MODU) and flowline route selection.

b. Drilling activities, such as positioning of the MODU, the sequence of tasks to drill and complete wells, and plugging and abandonment of wells which have no further use.

i. The OPP describes the process by which exploration wells that may be used as production wells may be suspended and subsequently completed and produced. Petroleum activities on an exploration and appraisal basis do not require an accepted OPP to be in place before submitting an environment plan (EP) to NOPSEMA. The OPP clearly describes the point at which a suspended exploration well becomes a production well – this point occurs when activities to complete the suspended well commence. An EP for activities to complete a suspended exploration well may only be submitted following acceptance of the OPP.

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

c. Installation, commissioning, operation, and decommissioning of subsea infrastructure to recover petroleum, such as Christmas trees, flowlines, umbilicals, and associated structures, on the seabed.

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

30. I found the OPP identified uncertainty in some details of the project's activities which were not resolved at the time of this decision, such as the exact locations of wells and subsea infrastructure. I found the proponent cannot resolve uncertainty in some details of the

project's activities at the time of the submission of the OPP to NOPSEMA, as their nature and scale depend on preceding project activities, such as surveys and drilling activities.

31. Where aspects of the offshore project and the activities that are part of the offshore project are uncertain, I found that assumptions made in the face of uncertainty, such as the composition of the reservoir fluids to be produced and the locations of wells, were appropriate and supported with adequate reasoning.

32. I found the OPP described a clear and logical process for identifying environmental aspects of the petroleum activities that are part of the project. The environmental aspects of these activities are described in the evaluations of planned impacts (Section 6 of the OPP) and unplanned risks (Section 7 of the OPP) in appropriate detail. The descriptions of the underwater noise emissions, hydrostatic test fluid discharges, artificial light emissions, and hydrocarbon spills are informed and supported by a series of technical reports which are appended to the OPP.

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

    a. Uses the EPBC Act protected matters search tool (PMST) reports (Appendices A and B to the OPP) that identify matters of national environmental significance and other matters protected by the EPBC Act in the Project Area and Planning Area (for the predicted worst-case unplanned hydrocarbon spill scenarios)

    b. uses an environmental survey report (Appendix C to the OPP) to characterise the benthic habitats and communities, sediment quality, and water quality in part the Project Area

    c. uses modelling studies to predict the spatial extent of the environment that may be affected by underwater noise emissions, hydrostatic test fluid discharges, artificial light emissions, and hydrocarbon spills, using appropriate impact thresholds to estimate the nature and scale of these environmental aspects.

34. I noted the planning area used to define the description of environment in the OPP (Section 4) is based on stochastic hydrocarbon spill modelling studies, which consider the worst-case credible hydrocarbon spills that may occur during the project and aggregates the results of hundreds of deterministic model runs with varying meteorological and oceanographic conditions.

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

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

b. ecosystems, habitats, species, and biological communities

c. Commonwealth and state protected areas

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

e. cultural features and heritage values.

36. I found the OPP describes relevant values and sensitivities of the environment listed under Part 3 of the EPBC Act that may be affected by the project (Sections 4, 6, 7, and 8 of the OPP), including:

a. relevant values of the Commonwealth Marine Area described in South-east Marine Region Profile (Commonwealth of Australia, 2015), including physical aspects of the environment such as water quality, sediment quality, bathymetry, seabed features, benthic habitats and communities, and key ecological features

b. species listed as threatened or migratory under the EPBC Act, including biologically important habitats for threatened and migratory species and ecological features considering information from the relevant recovery plans published under the EPBC Act

c. wetlands of national importance.

37. I found the Project Area does not overlap with any known Key Ecological Features (KEFs) or Australian Marine Parks.

38. I found that the OPP identified and described the feasible alternatives to the project and the activities that are part of the project (Section 3.9 of the OPP), including:

a. a clearly described process outlining relevant criteria, including environmental criteria, used to identify and compare the feasible alternatives to the project and the activities that are part of the project

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

c. evaluations of the feasible alternatives to the project and activities that are part of the project using the criteria established in Section 3.9.2 of the OPP supported by adequately detailed explanations of why the feasible alternatives were not preferred.

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

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

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

    a. describing the process by which the OPP demonstrates the environmental impacts and risks are acceptable (Section 5.8 of the OPP), which includes consideration of:

        i. the principles of ecologically sustainable development (Section 5.8.1 of the OPP)

        ii. relevant requirements, such as legislation and guidelines

        iii. the proponent's internal context, including relevant policies, standards, risk management frameworks, and procedures

        iv. external context, including consultation during preparation of the OPP and public comment made on the OPP.

    b. defining acceptable levels of impact and risk for the project and the activities that are part of the project (Section 5.8.5 of the OPP).

    c. applying the process described in Section 5.8 of the OPP to the evaluations of impacts and risks (Section 6, 7, and 8 of the OPP)

    d. demonstrating that the environmental performance outcomes will achieve a level of impact or risk that is equal to or less than the acceptable levels of impact and risk (Sections 6, 7, and 8 of the OPP).

41. I found the OPP defines acceptable levels of impact and risk which have a clear basis in the analysis of relevant facts and evidence (Section 5.8.5 of the OPP), because:

    a. the defined acceptable levels of impact and risk consider relevant principles of ecologically sustainable development

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

    c. the defined acceptable levels of impact and risk are consistent with requirements that apply to the project and the activities that are part of the project, such as the principles of ecologically sustainable development and relevant guidance material, such as the Australian and New Zealand guidelines for fresh and marine water quality

    d. the evaluations of impact and risk in the OPP include demonstrations of acceptability which explain why the predicted level of impact and risk, which are informed by relevant scientific literature, are acceptable

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

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

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

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

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

43. I found the OPP acknowledges and accounts for uncertainty associated with predicted environmental impacts of the project and identifies both likelihood and consequence metrics for all risks to the environment associated with unplanned events. The OPP accounts for uncertainty, commensurate with the degree of predictive uncertainty, intensity, severity and duration of impacts and the environmental value of the receptors that may be affected. Examples of where uncertainty has been addressed in the OPP include:

a. uncertainty in the reliability of the predictions of impact and risk for underwater noise associated with drilling, vessel noise and geophysical surveys (including vertical seismic profiling) because of uncertainty in the project schedule (and therefore likelihood of interaction with EPBC Act listed species that have seasonal presence in the Project Area). The OPP appropriately considers activities occurring during times of peak seasonal occurrence for EPBC Act listed species, including concurrent and successive activities as part of impact and risk evaluations and sets out appropriate acceptable levels of impact and risks and EPOs (supported by a suite of control measures). Environmental performance outcome EPO12 and the related control measure CM19 sets out a process to review and update underwater sound modelling as part of the assessment of impacts and risks prior to Project related activities being undertaken as part of the EP process, when the schedule and timing of activities is planned with a greater level of certainty.

b. there is uncertainty in the reliability of predictions of impact and risk for some underwater sound sources because modelling carried out to inform the OPP relied upon impact thresholds that were superseded nearing the end of the OPP assessment process. A review of the potential implications of applying the new thresholds was undertaken and is presented in the OPP noting that impacts may occur over a slightly larger area than predicted by modelling. However, I noted conservatism in the modelling process was applied and a commitment (EPO12) was made to review modelling as part of future EP process incorporating the most contemporary science available at the time.

c. there is uncertainty in relation to the final location of project infrastructure to be installed on the seabed, which will be subject to detailed design at the project planning progress. As a result, there is uncertainty in the benthic habitats and communities that may be disturbed. The OPP provides a reasoned prediction of the types of seabed habitats expected across the Project Area and includes EPOs, supported by control measures, that provide commitments to undertake further surveys and implement project execution plans and anchoring plans that will identify and avoid unique benthic habitats during project design and implementation.

d. for hydrocarbon spill risks, the OPP contains a commitment to consider the "full range of worst-case scenario LOWC consequences based on the best available oil-spill modelling" in future EPs and Oil Pollution Emergency Plans. Future EPs must contain future spill modelling based on appropriate input parameters including for example, contemporary metocean data and hydrocarbon characteristics derived from laboratory assays and/or weathering studies. EP assessments will also consider if an appropriate level of conservatism has been applied to the modelling outputs to inform risk assessments and spill response planning.

44. NOPSEMA's assessment of the OPP's evaluation of environmental impacts and risks included a focus on the higher order environmental impacts and risks which are covered in detailed assessment topics below, including in relation to:

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

b. potential environmental impacts and risks arising from greenhouse gas emissions and climate change

c. potential environmental impacts and risks to EPBC Act listed threatened and migratory whales arising from anthropogenic underwater noise

d. potential environmental impacts and risks to listed threatened and migratory seabirds and shorebirds arising from artificial light.

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

a. a logical process that is applied to identify and describe the matters protected under Part 3 of the EPBC Act that may be present within the Project Area and EMBA. The OPP utilised relevant information to adequately inform and support the descriptions, such as information available on the Department of Climate Change, Energy, Environment and Water (DCCEEW) website such as threat abatement plans, threatened species recovery plans and marine bioregional plans (Section 4).

b. a description of the key physical, biological, social, economic, and cultural features, values and sensitivities of the environment of the Commonwealth marine area. In particular, the OPP appropriately identifies and describes the key physical, biological, social, economic, and cultural features, values and sensitives of the environment that overlap with the EMBA. I considered that the OPP utilised relevant references and information sources to adequately inform and support the descriptions, such as contemporary peer-reviewed scientific literature and other authoritative sources (Section 4).

c. in relation to planned discharges:

   i. the OPP contains a thorough evaluation of the potential impacts and risks to the Commonwealth Marine Environment arising from planned discharges from the offshore project that is supported by scientific literature and technical studies and:

      A. considers all credible impact and risk pathways to components of the Commonwealth Marine Environment including impacts to sediment quality, water quality and benthic and habitats and communities

      B. has been informed by relevant and contemporary peer reviewed scientific literature and relevant project specific studies undertaken by suitably qualified subject matter experts to predict the likely fate and effects of drilling and operational discharges

      C. recognises uncertainty in the project design at the early stage of development by considering impacts across the whole of the Project Area, with commitments to undertake further studies as uncertainty is resolved with future development detailed design.

d. in relation to greenhouse gas emissions:

   i. the OPP identifies and describes sources of greenhouse gas emissions for the different stages of the project, including emissions from the use of the hydrocarbon produced by the project.

   ii. the OPP describes activities that generate greenhouse gas emissions during each of the project stages and provides estimates of all greenhouse emissions that may arise from the project using appropriate emissions quantification methods.

   iii. the OPP describes the key international arrangements, Australian legislative framework, and the company strategy and actions relevant to greenhouse gas emissions reduction. For example, the OPP outlines:

      A. the Paris Agreement, which Australia has ratified

      B. the Safeguard Mechanism, under which the Otway Gas Plant is a registered safeguard facility

      C. the National Greenhouse and Energy Reporting (NGER) Scheme

      D. the proponent's internal requirements, such as the Beach Corporate Greenhouse Gas Emission Management Plan.

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

v. In assessing the OPP, I had regard to the EPBC Act Policy Statement 'Indirect consequences of an action: Section 527E of the EPBC Act', in relation to greenhouse gas emissions, including scope 3 emissions. I considered that the project's scope 3 greenhouse gas emissions and climate change impacts that will be generated in transport and use of the petroleum product to be indirect consequences of the proposed activity that will likely fall within the definition of 'impact' under the Environment Regulations and within the context of the EPBC Act Policy Statement.

e. In relation to acoustic emissions:

i. the OPP identifies and describes, with reference to protected matters search tool reports, relevant and contemporary peer reviewed scientific literature and results of marine mammal observations undertaken by the proponent as part of previous development monitoring surveys, the listed threatened and migratory whale species that may occur within and in the vicinity of the project area, including the spatial areas (e.g., biologically important areas and habitat critical to survival of a species) and temporal periods where these species are expected to undertake biologically important behaviours (e.g., migration, foraging, breeding and resting).

ii. the OPP identifies and describes the sources of underwater sound emissions associated with the project and activities that are part of the project (including expected operating frequencies and source levels for both impulsive and continuous, non-impulsive noise sources) and used a suitably qualified subject matter expert, with reference to relevant and contemporary peer reviewed scientific literature, to make predictions of the distance from underwater sound generating activities at which sound effect thresholds for listed threatened and migratory whales may be exceeded.

iii. the OPP identifies and describes the legislative requirements that are relevant to the environmental management of impacts and risks to listed threatened and migratory whales arising from anthropogenic underwater noise including the conservation objectives and actions associated with the threat of noise interference in EPBC Act recovery plans and conservation advice for the listed threatened and migratory whales that may occur within and in the vicinity of the Project Area.

f. In relation to artificial light emissions:

i. the OPP identifies and describes, with reference to protected matters search tool reports, relevant and contemporary peer reviewed scientific literature, the listed threatened and migratory marine seabird and shorebird species that may occur within and in the vicinity of the Project Area and the environment that may be affected by artificial light emissions for vessel and flaring light sources, including the spatial areas (e.g. biologically important areas) and temporal periods where these species are

expected to undertake biologically important behaviours (e.g. nesting, fledgeling, foraging and migration).

ii. the OPP identifies and describes the sources of artificial light emissions associated with the offshore project that have the potential to expose listed threatened and migratory seabirds and shorebirds to levels of light exceeding biologically relevant thresholds that have been defined in the OPP by a suitably qualified subject matter expert with reference to relevant and contemporary peer reviewed scientific literature, including project specific light modelling.

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

46. I found the OPP demonstrates that the environmental impacts of the project would not contravene a plan of management for a World Heritage property; a plan of management for a National heritage place; or a plan of management for a Ramsar wetland.

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

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

48. I found the OPP includes a demonstration of acceptability in the evaluation of each environmental impact (Section 6) and risk (Section 7). Each demonstration:

a. appropriately evaluates the predicted environmental impacts and risks for each environmental aspect of the project and activities that are parts of the project; refer to paragraphs 39-46 for reasons why the impacts and risks were appropriately identified and evaluated.

b. compares the predicted impacts and risks to the relevant defined acceptable levels in Table 5-4 of the OPP and demonstrates that the predicted levels are equal to, or less than, the defined acceptable levels

c. consistently applies the process set out in Section 5.8 of the OPP for each environmental impact and risk evaluation; refer to paragraph 40 and 41 for reasons why I found this process appropriate.

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

49. NOPSEMA's assessment of the OPP's demonstration that environmental impacts and risks will be acceptable included a focus on the higher order environmental impacts and risks which are covered in detailed assessment topics listed in paragraph 44. Specifically, the OPP includes:

a. In relation to planned discharges:

i. the OPP defines acceptable levels of impacts and risks that are applicable to impacts to features of the Commonwealth Marine Environment that are susceptible to impacts and risks associated with drilling and operational discharges. The OPP has applied a clear and logical process to define these acceptable levels of impacts and risks that includes consideration of relevant context provided by scientific literature and modelling studies presented in the OPP.

ii. the OPP implements an evidence-based evaluation process to demonstrate that potential impacts and risks to the Commonwealth Marine Environment arising from the drilling and operational discharges of the offshore project will be managed to an acceptable level through the implementation of suitable control measures. The process includes a comparison of predicted impacts and risks with the relevant defined acceptable levels of impacts and risks with sufficient evidence provided to demonstrate that predicted impacts and risks will be restricted in spatial extent and return to baseline conditions following completion of planned discharges.

b. In relation to greenhouse gas emissions:

i. the OPP defines the acceptable level of impact for greenhouse gas emissions and provides analysis as to why the proponent considers this will be met. The acceptable level is aligned with Australia's commitments made under the Paris Agreement. The OPP also applies the process used for other impacts and risks, which considers various acceptability criteria such as meeting the principles of ecologically sustainable development, internal and external context, matters of national environmental significance and other relevant requirements.

c. In relation to acoustic emissions:

i. the OPP applies a clear and logical process to defining acceptable levels of impact and risk that are applicable to the effects of underwater sound on listed threatened and migratory whales, drawing upon relevant context such as the relevant conservation objectives and actions in EPBC Act recovery plans and conservation advices for listed threatened and migratory whales that may occur within and in the vicinity of the Project Area.

ii. the OPP implements an evidence-based evaluation process to demonstrate that potential impacts and risks to listed threatened and migratory whales arising from

underwater sound emissions will be managed to an acceptable level through the implementation of suitable control measures (e.g., the OPP includes a commitment to implement Beach Energy Whale Management Procedures for underwater sound emitting activities such as vessel operations, drilling and vertical seismic profiling, the key features of which are identified in the OPP), as well as a commitment to implement appropriate adaptive management measures for inclusion into activity specific EPs when the uncertainty around timing of specific activities is resolved.

iii. the evaluation process includes a comparison of predicted impacts and risks with the relevant defined acceptable levels of impacts and risks with sufficient evidence provided to demonstrate that there is a high degree of certainty that predicted impacts and risks will not be inconsistent with EPBC Act recovery plans and conservation advice for the listed threatened and migratory whales that may occur within and in the vicinity of the Project Area.

d. In relation to artificial light emissions:

i. the OPP defines acceptable levels of impacts and risks that are applicable to the effects of artificial light on seabirds and migratory shorebirds. The OPP has applied a clear and logical process to define these acceptable levels that includes consideration of relevant context such as the conservation objectives and actions associated with the threat of light pollution in the Recovery Plans for Albatross and Petrels and Orange Bellied Parrot as well as Conservation Plans for Seabirds and Migratory Shore Birds.

ii. the OPP implements an evidence-based evaluation process to demonstrate that potential impacts and risks to seabirds and migratory shorebirds arising from artificial light emissions will be managed to an acceptable level through the implementation of suitable control measures (e.g., the OPP includes a commitment to contract appropriately qualified lighting practitioners, together with an appropriately qualified marine biologist to develop and support implementation of a Light Management Procedure that is aligned with the principles described in the National Light Pollution Guidelines for Wildlife (Commonwealth of Australia 2023)). The OPP also includes a commitment to include adaptive management into the Light Management Procedure when uncertainty around the timing of specific activities that are part of the offshore project are resolved (i.e., in developing activity specific environment plans).

50. I found the cumulative environmental impact evaluation in Section 9 of the OPP demonstrated that cumulative impacts will be acceptable, as:

a. The cumulative impact assessment reasonably identified the potential cumulative impacts that may arise from the interactions between the project's aspects and the combination of the project's activities with other reasonably foreseeable activities in the region.

b. The predicted cumulative impacts were compared to the acceptable levels of impact and risk set out in Table 5-4 and demonstrated to be equal to or less than the acceptable levels

51. I found that the environmental performance outcomes for unplanned events, such as introduction of invasive marine species and hydrocarbon spills, are consistently set to prevent such outcomes from occurring. This provides a clear commitment by the proponent to prevent many of the higher order risks from becoming realised.

52. I found the OPP makes clear commitments to achieve the environmental performance outcomes and then implement the controls associated with the outcomes. Section 9 of the OPP outlines key parts of the environmental management system that will be applied when undertaking the project and activities that are part of the project. Key parts of the proponent's environmental management system described in the OPP include:

    a. The risk management and hazard control element, which requires the proponent to manage risks and includes preparedness to respond to unplanned events

    b. The environment and community element of the proponent's operational excellence management system (Section 9.2.9) of the OPP, which requires the proponent to:

        i. ensure that appropriate plans and procedures are in place to manage environmental impacts and risks

        ii. undertake community engagement in relation to the proponent's activities.

    c. the assurance and reporting element, which provides for monitoring and reporting of environmental performance. This element provides a mechanism for identification of non-compliance and improvement of environmental management.

53. I found that the environmental management system elements described in Section 9 of the OPP align with the ISO 14001 and ISO31000 standards, which are appropriate management system standards to apply to the project. These standards were developed by subject matter experts and are widely applied in the environmental management of offshore petroleum activities.

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

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

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

    a. were consistent with the principles of ecologically sustainable development

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

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

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

        i. I considered the proponent's evaluation of the social, economic and ecological values that may potentially be affected by the project. The OPP demonstrated an integrated approach to considering all environmental features, including relevant social, cultural and economic features that make up the environment as defined under s 5 of the Environment Regulations. Specifically, the OPP includes an evaluation of the potential environmental impacts and risks of the project on Commonwealth and State managed fisheries, tourism and recreation, marine and coastal industries taking into account both long-term and short-term considerations. For example, long-term considerations, such as decommissioning approaches have been applied, including commitments to comply with s 572 of the OPGGS Act.

        ii. The OPP has demonstrated that environmental impacts and risks to these socio-economic and ecological values will be of an acceptable level. For example, acceptable level 14 commits to no interference with other marine users to a greater extent than necessary for the reasonable exercise of rights and performance of duties as conferred by the proponent's petroleum titles. EPO01 and EPO02 in the OPP and the associated controls will ensure the project's impacts do not exceed this acceptable level through management of the project.

    b. If there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation (the 'precautionary principle').

        i. I have considered the proponent's evaluation of environmental impacts and risks as well as its case for why these environmental impacts and risks will be of an acceptable level. I have considered the threat of serious or irreversible environmental damage and how the proponent has addressed uncertainty.

        ii. I found the OPP takes a conservative approach and applies the precautionary principle in defining acceptable levels of impact and risk, and in the demonstration of acceptability for each environmental impact and risk. Hence it is clear that the precautionary principle has been considered where the project's activities may pose a threat of serious or irreversible environmental harm.

        iii. I found the OPP takes an environmentally conservative approach in determining the nature and scale of environmental impacts and risks. For example, the calculation of the seabed disturbance footprint which forms the basis of the seabed disturbance impact evaluation is very conservative and over-estimates the actual seabed disturbance that

will occur. Further the stochastic modelling approach using worst-case credible spill scenarios resulted in a conservative risk evaluation of hydrocarbon spills.

iv. I found the OPP does not use lack of scientific certainty as a reason for postponing measures to prevent environmental degradation. For example, the OPP includes adaptive management controls for artificial light (CM13) and underwater noise (CM15) emissions to manage uncertainty about the nature of impacts from these environmental aspects to fauna.

c. The present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations (the 'intergenerational principle').

i. I considered the proponent's evaluation that the health, diversity and productivity of the environment, as defined in the Environment Regulations to include social, economic and cultural features, is maintained or enhanced for the benefit of future generations. I found that this evaluation appropriately considered the intergenerational principle, because the environmental management of the project will ensure that future generations may continue to use the environment.

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

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

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

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

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

ii. I found the environmental performance outcomes are consistent with relevant EPBC Act statutory recovery plan and plans of management and the evaluation of impacts and

risks from the project demonstrates that they can be managed to an acceptable level, consistent with the biodiversity principle.

iii. I found the defined acceptable levels of impact and environmental performance outcomes are consistent with requirements in recovery plans for threatened species. For example, Acceptable level 3 requires the project's impacts to not be inconsistent with conservation advice, recovery plans and threat abatement plants for EPBC Act listed threatened, migratory, or cetacean species. A range of environmental performance outcomes (e.g., EPO07, EPO08, EPO09, EPO10, EPO11, and EPO12) will ensure impacts and risks do not exceed this acceptable level.

iv. I found that there are environmental performance outcomes that demonstrate the ecological integrity of the Commonwealth marine area will be maintained and that impacts will be of an acceptable level. Examples include a suite of environmental performance outcomes (e.g., EPO04, EPO07, EPO08, EPO09, EPO10, EPO11, EPO12, EPO16, EPO17, EPO18, EPO19, EPO20, and EPO21) that commit to ensuring that the ecological integrity of the environment that may be affected is maintained, through limiting impacts to marine habitats and ensuring marine species can continue to use the environment and undertake biologically important behaviours.

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

i. I considered that the proponent is required to bear the costs relating to management of environmental aspects of the project and its activities to ensure that environmental impacts and risks will be of an acceptable level. The proponent sets out a range of ways by which the valuation principle is given effect for the project (Table 5-2), such as:

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

B. the requirements of s 572 of the OPGGS Act, which requires the proponent to remove their property from petroleum titles

C. the application of the safeguard mechanism to the project's scope 1 and scope 1* emissions described in the OPP, which incentivises the proponent to reduce their emissions over time.

57. NOPSEMA's assessment of the OPP's demonstration that environmental impacts and risks will be acceptable included a focus on the higher order environmental impacts and risks which are covered in detailed assessment topics listed in paragraph 44. Specifically, the OPP includes:

a. In relation to planned discharges:

i. the OPP includes EPOs that are consistent with the principles of ESD and that require the implementation of control measures to implement processes and procedures (the

key features of which are set out in the OPP that demonstrate the EPOs will be achieved). These include (but are not limited to) a chemical selection process to ensure chemicals used are environmentally acceptable while also meeting technical requirements (EPO17), a cementing program to reduce and avoid excess cement discharge on completion of the drilling program (EPO22) and to undertake a Hydrotest assessment to detail the hydrotesting requirements including the definition of discharge characteristics (i.e. chemical additives and concentrations), discharge locations and volumes, methodology and species impact thresholds (EPO23).

b. In relation to greenhouse gas emissions:

   i. the OPP includes EPO15 to manage the project's greenhouse gas emissions. This EPO is supported by CM22, CM23, CM24, CM25, CM26, and CM27.

   ii. EPO15 sets an appropriate environmental performance outcome relevant to the potential climate change impacts of the project's emissions because:

      A. EPO15 is aligned with Australia's commitments to achieving net zero emissions by 2050 and is consistent with Australian legislative mechanisms to reduce and offset greenhouse gas emissions.

      B. There are management controls in place to monitor, reduce, and manage the project's emissions to demonstrate EPO15 can be met including (though are not limited to) complying with the Safeguard Mechanism, preventing and detecting leaks to reduce fugitive emissions, monitoring of greenhouse gas emissions, and pursuing opportunities for emissions abatement.

c. In relation to acoustic emissions:

   i. I found the OPP includes environmental performance outcomes that are consistent with the objectives of the recovery plans for the pygmy blue whale and southern right whale (i.e., EPO07, EPO08, and EPO10).

   ii. While some uncertainty exists in the timing of activities, and therefore the likelihood of interaction with whales undertaking biologically important behaviours within a foraging BIA for the Blue Whale, I found the OPP provides control measures to demonstrably minimise impacts to whales (e.g. "Anthropogenic noise in biologically important areas and habitat critical to the survival of a species will be managed such that any blue whale continues to utilise biologically important areas without injury, and is not displaced from a foraging area." [EPO10]) with further commitments to implement appropriate adaptive management measures once uncertainty in project timing is resolved. The relevant control measures in the OPP commit to implementing these adaptive management measures in future activity specific EPs.

d. In relation to artificial light emissions:

i. I found the OPP includes environmental performance outcomes that are consistent with the objectives of the recovery plans for the Orange Bellied Parrot and Albatross and Petrels to achieve a stable or increasing population (i.e., "EPO7: No death or injury to listed threatened or migratory species from Project activities" and "EPO8: Biologically important behaviours can continue while Project Activities are being undertaken").

58. I found that the EPOs in combination with the proponent's evaluation of environmental impacts and risks, demonstrate that:

    a. The project and activities that are part of the project will be managed such that environmental impacts and risks to the values of the Commonwealth marine area will be equal to or below the defined acceptable levels.

    b. The offshore project will not be carried out in a way that is inconsistent with relevant EPBC Act management plans for listed threatened species. For example, environmental performance outcomes for acoustic emissions (EPO07, EPO08, EPO10, EPO11, and EPO12) are consistent with recovery plans and conservation advice for listed threatened and migratory cetaceans.

59. Relevant policy and guidance documents have been used by the proponent to support the evaluations of environmental impacts and risks to demonstrate that the offshore project is able to be managed to ensure environmental impacts and risks will be of acceptable levels. Relevant information considered includes the Marine Bioregional Plan for the South-east marine bioregional profile (Commonwealth of Australia, 2015) and the EPBC Act Policy Statement – 'indirect consequences' of an action: Section 527E of the EPBC Act.

60. The hydrocarbon spill risk will be of an acceptable level, as the acceptable level is 'Unplanned loss of containment – hydrocarbon and chemicals is unacceptable', with EPO07, EPO27, and EPO28 and associated controls achieving this acceptable level.

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

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

Other Considerations

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

62. 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.

63. In implementing the Program, NOPSEMA conducts assessments of OPPs against the requirements of the Program, which includes meeting the acceptance criteria and content

requirements under the Environment Regulations. Specific Program commitments relating to protected matters under Part 3 of the EPBC Act are outlined in Table 2 of the Program report and must be applied during decision making with respect to offshore projects and activities.

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

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

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

        ii. southern right whale BIAs overlaps (migration) and lie in proximity (reproduction) to the project area, the OPP demonstrated that the National Recovery Plan for the Southern Right Whale (*Eubalaena australis*) was considered during the evaluation of impacts in the OPP. The activity was demonstrated to not be inconsistent with this plan.

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

    c. appropriate control measures are presented in the OPP to ensure that impacts to threatened or migratory species, and to the Commonwealth marine area, will be of an acceptable level.

The Program: Cumulative Environmental Impacts

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

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

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

    a. potential cumulative impacts of underwater noise emissions from concurrent drilling and vessel activities that are parts of the project are considered in Section 6.4 of the OPP

    b. potential cumulative impacts from the offshore project and other activities in the Otway region, such as commercial shipping, petroleum activities by other organisations, and offshore renewable energy construction.

68. I was reasonably satisfied that cumulative impacts will be managed to an acceptable level because:

    a. the cumulative impacts were demonstrated to be equal to or less than the acceptable levels of impact and risk defined in Section 5.8.5 of the OPP

    b. the OPP presents reasoned arguments why the acceptable levels are appropriate, including reference to the principles of ecologically sustainable development, the EPBC Act, and relevant guidelines

    c. the OPP outlines appropriate controls to manage the project's environmental impacts and risks, including cumulative impacts, in sections 6, 7, and 8.

The Program: Indirect Consequences of an Action

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

70. In assessing the OPP, I had regard to the indirect consequences policy, in relation to indirect greenhouse gas emissions, and considered that:

    a. The OPP identified in Section 2.4 that the indirect consequences policy was a relevant requirement to the assessment of greenhouse gas emissions.

    b. The OPP identifies downstream indirect scope 3 emissions as an environmental aspect of the project as part of the project's overall greenhouse gas emissions in Section 6.6.3.1.

    c. The OPP quantifies the downstream indirect scope 3 emissions using an appropriate methodology in Appendix K and considers these emissions in the context of Australian and global carbon budgets.

    d. The impacts of the project's greenhouse gas emissions on the Australian environment are described and evaluated in Sections 6.6.3 and 6.6.4 of the OPP.

71. I found that, for the reasons outlined above, that the OPP gave adequate regard to the indirect consequences policy by identifying and assessing indirect downstream greenhouse gas emissions from the project.

Signed

Sue McCarrey
Chief Executive Officer

17 April 2025

Appendix A: Relevant Terms

72. In this statement, the words and phrases have the following meaning:

a. The *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (Cth) is referred to as the OPGGS Act.

b. The National Offshore Petroleum Safety and Environmental Management Authority is referred to as NOPSEMA.

c. The Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023 (Cth) are referred to as the Environment Regulations.

d. The Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (Cth) are referred to as the 2009 Environment Regulations.

e. The offshore project means the petroleum activities for the purposes of the recovery of petroleum, other than on an appraisal basis, described in Otway Offshore Gas Victoria (Ref: V-1000-01-MP-0001, Revision 6, dated Wednesday, 2 April 2025).

f. The *Environment Protection and Biodiversity Conservation Act 1999* is referred to as the EPBC Act.

g. The proponent means Beach Energy (Operations) Limited.

h. Principles of ecological sustainable development (ESD) means the principles set out in s 3A of the EPBC Act.

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

j. EPBC Program refers to environmental management authorisation process for petroleum and greenhouse gas storage activities administered by NOPSEMA under the Environment Regulations endorsed by the Minister for Environment under s 146 of the EPBC Act.

k. The Strategic Assessment Report for strategic assessment of the environmental management authorisation process for petroleum and greenhouse gas storage activities administered by NOPSEMA under the OPGGS Act is referred to as the SAR.

Appendix B: Key Materials Considered in Making the Decision

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

a. The OPP, comprising the proposal submitted to NOPSEMA by Beach Energy (Operations) Limited (Document Number V-1000-01-MP-0001, Revision 6, dated Wednesday, 2 April 2025 and the supporting appendices, which include a summary of the public comments received.

b. The legislative framework relevant to OPP assessments:

   i. the OPGGS Act

   ii. the Environment Regulations

   iii. the Endorsed EPBC Program[1].

c. Policies and Guidelines:

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

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

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

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

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

d. Guidance:

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

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

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

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

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

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

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

e. Procedures:

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

f. Information papers:

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

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

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

g. Bulletins:

   i. NOPSEMA Oil spill modelling Environment Bulletin (2019)

h. The findings and briefings provided by the assessment team

i. Technical advice from the Clean Energy Regulator.

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

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

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

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

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

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