



REPORT ON PUBLIC COMMENTS

Sauropod 3D Marine Seismic Survey
(WA-527-P)

EXTERNAL


Document Status

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PREPARED BY:


**Level 3, 500 Hay Street
Subiaco WA 6008**

**T +61 8 9211 1111
W rpsgroup.com**



Report on public comments

CGG Services (Australia) Pty Ltd (CGG) is proposing to undertake the Sauropod 3D marine seismic survey (hereafter referred to as the Sauropod 3D MSS) in exploration permit area WA-527-P, which is located on the North West Shelf in the Roebuck Basin. The purpose of the Sauropod 3D MSS is to collect three-dimensional (3D) geophysical data about the underlying rock types to inform oil and gas exploration.

Three Environment Plans (EPs) for this activity have been previously accepted by NOPSEMA, one that was developed and submitted by 3D Oil in 2020 for a survey to occur during 2021, one developed and submitted by CGG for a survey to occur in 2022, and one developed and submitted by CGG for a survey to occur in 2024 or 2025. None of these surveys eventuated, and CGG is now planning to conduct the survey in WA-527-P in 2026 or 2027 under a revised and updated EP. This triggered the need for another public comment period in 2025 (Regulation 11(C)), undertaken following a comprehensive stakeholder consultation process commenced in June 2025 at the start of the EP revision process.

This report on public comments has been prepared in response to comments received during the October/November 2025 public comment period in which 32 responses were received. All of these responses were considered during the review process. They were firstly categorised as either relevant to the EP or the activity to which the EP relates, or not relevant. Relevant comments were sub-grouped where they raised common concerns, to provide better consistency in responses while maintaining the intent and key claims of the responses. CGG addressed the relevant claims raised by relevant persons using reasoned and supported information contained within the EP Rev 3.0, and the responses highlighted the relevant sections in the EP. No new issues were raised which had not been adequately addressed through consultation and preparation of the EP. Therefore, no change of objectives, impact assessment or control measures were considered necessary.

A total of 32 responses were received during the October/November 2025 public comment period. One comment was from a person who was already considered a relevant person in the EP. Therefore, their comment was dealt with via the consultation process described in the EP. The response provided to the relevant person is provided in Table 1. An additional five submissions of the same letter submitted by the relevant person were received in separate submissions. Given the concerns were the same, responses to these submissions are also captured in Table 1.

A number of comments were received during the 2025 period that did not relate to the EP or the activity to which the EP relates. These comments related to:

- Generally against oil and gas/ seismic survey/ fossil fuels
- Climate change
- Climate change commitments (Paris Agreement).

Due to the irrelevancy of the comments, they were not considered further in preparing the EP.

The comments received that relate to the EP have been grouped into similar 'matters' and responded to in

Table 2. There were no changes made to the 2025 EP in response to public comments as the EP already addresses the matters and claims raised.

A record of responses to previous EPs is also provided for comparison. Only one comment was received in the 2023 public comment period. The comment was from a person who was already considered a relevant person in the EP. Therefore, their comment was dealt with via the consultation process described in the EP. The response provided to the relevant person is provided in Table 3.



Table 1: 2025 Public comment period: Relevant person comments

#	Comment received	Titleholder response
1.	The risks to endangered sea snakes, turtles, sawfish and whales will need to be carefully considered for residual impact, as measured against a range of criteria, including direct and indirect impact, and cumulative impact.	The Sauropod 3D MSS impact and risk assessment is based on the evaluation of impacts and risks that are credible, realistic and appropriate to the nature and scale of the activity. The risk assessment methodology employed in the Environment Plan carefully assesses for residual impact as measured against a range of criteria (see Section 6 of the EP for a description of the methodology). Residual risk to marine fauna including sea snakes, turtles, sawfish and whales that may potentially occur in the Operational Area or EMBA are provided throughout the risk assessment sections (Sections 7 & 8). An assessment of the cumulative impacts from seismic surveys is provided in Section 7.2.
2.	The project contains or will produce indirect impacts to marine parks, habitat critical to the survival of a marine turtle, a Nationally Important Wetland (Mermaid Reef).	The Sauropod survey area is in proximity to but not within the Mermaid Reef Australian Marine Park, which is 69 km away from the Operational Area. The closest turtle habitat to the survey is the flatback turtle internesting buffer at Eighty Mile Beach, approximately 60 km from the Operational Area. A comprehensive assessment for the potential impacts on marine reptiles including 'habitat critical' and on the marine parks in the vicinity of the survey is provided in Sections 7.1.5.2 and 7.1.5.9 of the EP, respectively. Based on the timing and duration of the Sauropod 3D MSS and the control measures that will be implemented, predicted noise levels from seismic acquisition are not considered likely to cause any impacts to the natural or cultural heritage values of any AMP in the region, including the Mermaid Reef Australian Marine Park. In addition, predicted noise levels from seismic acquisition are not considered likely to cause PTS effects, displace any individuals from the internesting BIA or 'Habitat Critical' areas, or result in any ecologically significant impacts at a population level for any species of turtle that may be present within or adjacent to the Operational Area during the survey. The relevant management controls are indicated in Section 7.1.7, outlining the potential impacts to the marine parks will be mitigated to ALARP and Acceptable levels in accordance with the environmental regulatory requirements for the Sauropod seismic survey.
3.	The Proposal contains foraging grounds, which support rich planktonic communities, critical to ecological function of the marine environment. CCWA is particularly concerned by the findings of impact to zooplankton and the possible risks to ecosystem dynamics.	A comprehensive assessment of the potential effects of seismic noise on zooplankton is provided in Section 7.1.5.6 of the EP, using the latest Australian and international research. The predicted maximum distance that zooplankton could suffer mortality is 130 m from the seismic source. While some mortality of zooplankton is possible, the overall consequence is expected to be negligible, and less than natural mortality rates. In accordance with the management controls set out in Section 7.1.7, the seismic activity will be managed so that potential impacts and risks to zooplankton are reduced to ALARP and Acceptable levels in accordance with the environmental regulatory requirements for the Sauropod seismic survey. There is no residual or long-term impact expected from routine operations to zooplankton and thus to ecological function.
4.	Simultaneous activities have the potential to produce additional and cumulative risks that will need to be further assessed.	Section 7.2 of the EP assesses the potential for cumulative impacts associated with Sauropod 3D MSS being undertaken in an area where other seismic surveys have previously occurred, as well as concurrently (at the same time) as other marine seismic surveys in the area.



# Comment received	Titleholder response
<p>5. The operational times between January to May will overlap Pygmy Blue Whale April-May migration.</p>	<p>Review of the NOPSEMA website (Industry environment plans; accessed 30/7/2025) indicates that within the scheduled period of the Sauropod 3D MSS (January to May 2026 or 2027) no other seismic surveys are proposed in the region that:</p> <ul style="list-style-type: none"> • May occur within the same EP time frames, within 150 km of the Sauropod MSS • Either have an EP accepted by NOPSEMA or have submitted an EP to NOPSEMA that is currently under assessment. <p>Note that the Sauropod EP does not assess cumulative impacts from seismic surveys in the region that occur after the Sauropod 3D MSS, as it is the responsibility of that titleholder to assess the cumulative impacts. In the event that a new EP is submitted to NOPSEMA for another seismic survey that temporally and spatially overlaps with the Sauropod 3D MSS survey area CGG will assess the cumulative impacts of that survey through either the EP development process or the MoC process as part of the ongoing environmental management of the impacts and risks of the activity.</p> <p>The EP presents concurrent impact assessment to marine fauna, fish and elasmobranchs, fish spawning, plankton, fish eggs, larvae, benthic invertebrates, and commercial fisheries over several pages and CGG disagrees that the cumulative impact from seismic surveys is not discussed in detail.</p> <p>Section 7.8 of the EP discusses the impact of air emissions including the contribution of greenhouse gases (GHG) and pollutants to the atmosphere. It is acknowledged in Section 7.8.2 of the EP that the seismic survey vessel and support vessels present in the Operational Area will generate atmospheric emissions from power generation and waste incineration. Atmospheric emissions have the potential to result in a localized reduction in air quality in the immediate vicinity of the vessel exhaust and to contribute to Australian and global levels of GHG in the atmosphere. Given the low level of emissions anticipated, survey emissions only represent a very small contribution to overall Australian and global GHG emissions to the atmosphere.</p>
<p>6. The operational times between January to May will overlap peak spawning of several demersal fish,</p>	<p>As described in Section 7.1.5 of the EP the Pygmy Blue Whale migration BIA passes along the shelf edge at depths between 500 m and 1,000 m. The migration BIA is located 72 km from the Operational Area. Acquisition of the survey may overlap the commencement of the northbound migration (April) but avoids the southbound migration period for Pygmy Blue Whales in the region (October – December). Possible foraging areas for the Pygmy Blue Whale have been identified as off Exmouth and Scott Reef and Perth Canyon, the closest area being approximately 400 km distant from the Operational Area. Hence, there is a possibility of isolated individuals transiting through the Operational Area during the start of the northern migration in the region. However, satellite tagging and passive acoustic data indicates only minor use of continental shelf waters and limited foraging by migrating pygmy blue whales along the northwest coast where the Operational Area is located.</p>
	<p>A detailed assessment of the potential effects of seismic sound on fish, marine reptiles and seabirds is provided in Sections 7.1 and 7.2 of the EP. Survey acquisition will be timed to avoid or limit temporal overlap with the spawning</p>



# Comment received	Titleholder response
seabird foraging, Flatback Turtle internesting, and nesting periods of Loggerhead Turtle. Impact to wildlife during critical migratory or breeding periods needs to be carefully assessed and strategies to eliminate risk applied.	periods for key indicator species for commercial fisheries and commercial fishing operations. Predicted noise levels from seismic acquisition are not considered likely to cause PTS effects, displace any individuals from the internesting BIA or 'Habitat Critical' areas, or result in any ecologically significant impacts at a population level for any species of turtle that may be present within or adjacent to the Operational Area during the survey. Seabirds are not anticipated to be displaced from the wider areas of the breeding and foraging BIAs. The relevant management controls are indicated in Section 7.1.7, outlining the potential impacts to the marine environment will be mitigated to ALARP and Acceptable levels in accordance with the environmental regulatory requirements for the Sauropod seismic survey.
7. The seismic blasting level is sufficient to cause impacts to a wide range of species.	A comprehensive assessment for the potential impacts from seismic noise emissions on marine environmental receptors in the vicinity of the survey is provided in Section 7.1. Based on the timing and duration of the Sauropod 3D MSS and the control measures that will be implemented, the residual risk associated with underwater noise emissions from the seismic source has been assessed as Low to Medium and will not have a 'significant impact' upon Protected Matters in accordance with EPBC Policy Statement 1.1. – Significant Impact Guidelines. The relevant management controls are indicated in Section 7.1.7, outlining that potential impacts to the receptors will be mitigated to ALARP and Acceptable levels in accordance with the environmental regulatory requirements for the Sauropod seismic survey.
8. Risks are being downplayed.	<p>The environmental risk assessment methodology followed by CGG is to international standards and clearly defined in the EP. The assessment of planned and unplanned events associated with the seismic survey is thorough and the process of defining control measures to reduce the impacts and risks to as low as reasonably practical and acceptable levels is also clearly defined. Through this process, CGG has reduced the impact of underwater noise emissions from the seismic source to prevent serious or irreversible ecological damage. Impacts are expected to have a Negligible or Minor consequence. The impact of seismic noise to marine life and potential interactions are understood and managed in accordance with EPBC Policy Statement 2.1 and applicable industry standards and best practice guidance.</p> <p>Seismic survey activities will be undertaken in alignment with the EPBC Act Part 3 (18A and 20A) and Significant Impact Guidelines 1.1, whereby activities do not have a significant impact on a listed threatened or migratory species population or a listed threatened ecological community, and do not result in the mortality or physical injury of an individual of an EPBC listed (marine fauna) species.</p> <p>The predicted level of impact from underwater noise emissions from the seismic source does not exceed the defined acceptable level of impact to marine fauna, given the controls adopted will prevent mortality or physical injury to EPBC listed marine fauna species, as well as prevent a significant impact on a listed threatened or migratory species population or a listed threatened ecological community.</p>
9. Data gaps are being overlooked and uncertainties of knowledge disregarded.	To develop the Sauropod EP, CGG has considered previous impact and risk assessments for similar activities, relevant published studies (both peer reviewed and grey literature) and stakeholder concerns/feedback. Wherever possible, site-specific and activity-specific data have been used in the impact and risk assessment. However, to



# Comment received	Titleholder response
	address areas of uncertainty, a precautionary approach has been taken and a conservative “worst case” has been applied where there is uncertainty in the level of harm. The precautionary approach requires uncertainty in the analysis to be addressed by using conservative assumptions that may result in a control measure being more likely to be adopted, as discussed in the impact/risk assessment methodology of the EP (Section 6).
10 Impact to sea snakes from seismic blasting could be especially pertinent given the likely presence of several species of sea snake in the EMBA, two of which are listed as Critically Endangered, and the relative absence of data on the causes of decline in these species, and the scarcity of data for impact from underwater noise.	CGG has used the best available literature to assess noise impacts to marine reptiles. Chapuis et al. (2019) found the hearing sensitivity for the Stokes sea snake ranges from 40-600 Hz. The findings of the study concluded that sea snakes possess a relatively low hearing sensitivity for sound pressure and particle acceleration when compared to other marine invertebrates (both fish and marine turtles). Therefore it is considered conservative to apply the sound thresholds for marine turtles to sea snakes in the absence of further data.
11 Delaying decision-making until such time as more data becomes available; until such time that risks can be conclusively established as insignificant; or until such time as alternative technologies or practices are available to mitigate harm.	CGG applies the Oil and Gas UK (OGUK) (2014) Guidance on Risk Related Decision Making to determine the assessment technique applied for each impact or risk. CGG has considered previous impact and risk assessments for similar activities, relevant published studies (both peer reviewed and grey literature) and stakeholder concerns/feedback. Wherever possible, site-specific and activity-specific data have been used in the impact and risk assessment. However, to address areas of uncertainty, a precautionary approach has been taken and a conservative “worst case” has been applied where there is uncertainty in the level of harm. The precautionary approach requires uncertainty in the analysis to be addressed by using conservative assumptions that may result in a control measure being more likely to be adopted, as discussed in the impact/risk assessment methodology of the EP (Section 6).
12 CCWA was not able to clearly ascertain from the information provided the response time frames that would apply, in the event of a significant environmental event, or how an adverse wildlife event, for example, due to the seismic activities, would be reported or managed.	Section 9.12 - Notifications and Reporting requirements for reporting and recording incidents relevant to the activity. Under Regulation 24(c) and 47 of the OPGGS(E), CGG is required to notify NOPSEMA of any recordable (An incident arising from the activity that breaches an EPO or EPS in the EP that applies to the activity that is not a reportable incident) and reportable (An incident arising from the activity that has caused, or has the potential to cause, moderate to significant environmental damage) incident within a specified timeframe. Environmental incidents will be reported to the relevant government agency by the Client Site Representative. Reportable Incidents are described in Table 9-1 including the relevant timeframes. For example, vessel strike with a cetacean or marine turtle would be reported to NOPSEMA within two hours, and the death or injury of a listed threatened species; all cetacean species; listed migratory species or listed marine species would be reported to DCCEEW within seven days.
13 CCWA rejects visual monitoring as a reliable method	The activity is consistent with EPBC Act Policy Statement 2.1 Part B.1 Marine Mammal Observers. The ALARP Demonstration in Sections 7 and 8 of the EP has considered additional methods of detecting cetaceans (e.g. Passive Acoustic Monitoring) and survey acquisition is timed to avoid the Humpback whale migration season. Other potential methods for detection (e.g. aerial surveys, additional spotter vessels) have been ruled out as the cost is clearly disproportionate to the benefit gained. Adaptive management measures have been implemented to further reduce the



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<p>14 Cumulative impacts are inadequately considered. The cumulative impacts of other proponent led seismic survey operations and other aspects of offshore projects (e.g., from drilling operations, spills, emissions, etc.) are not discussed in any detail in the EP.</p>	<p>already low likelihood of impacts to PBW. This is because the survey timing may coincide with the species' presence in the region.</p> <p>Section 7.2 of the EP assesses the potential for cumulative impacts associated with Sauropod 3D MSS being undertaken in an area where other seismic surveys have occurred previously and concurrently (at the same time) as other marine seismic surveys in the areas. There were no seismic surveys identified as potentially occurring within the same EP time frames that have an EP accepted by NOPSEMA or have submitted an EP to NOPSEMA and is currently under assessment, as identified by a review of the NOPSEMA website (Industry environment plans; accessed 30/7/2025) for the activity period of the Sauropod 3D MSS (January to May 2026 or 2027). Thus, only the cumulative impacts of previous seismic surveys were assessed.</p>
	<p>The EP presents concurrent impact assessment to marine fauna, fish and elasmobranchs, fish spawning, plankton, fish eggs, larvae, benthic invertebrates, and commercial fisheries over 19 pages and therefore CGG disagrees that the cumulative impact from seismic surveys is not discussed in detail.</p> <p>Section 7.8 of the EP discusses the impact of air emissions including the contribution of greenhouse gases (GHG) and pollutants to the atmosphere. It is acknowledged in Section 7.8.2 of the EP that the seismic survey vessel and support vessels present in the Operational Area will generate atmospheric emissions from power generation and waste incineration. Atmospheric emissions have the potential to result in a localized reduction in air quality in the immediate vicinity of the vessel exhaust and to contribute to Australian and global levels of GHG in the atmosphere. Given the low level of emissions anticipated, survey emissions only represent a very small contribution to overall Australian and global GHG emissions to the atmosphere.</p>
<p>15 Synergistic, additive, or antagonistic interactions between seismic sound impacts and other stressors has not been studied. Additional pressures to reef and other ocean ecological systems, including sea level rises; changes in sea temperature; and ocean acidification, resulting from climate change; marine debris; physical habitat modification; oil production; and invasive species (in accordance with DCCEEW 'sprat' identified pressures), should also be considered in environmental assessments for all offshore oil and gas.</p>	<p>The OPGGS Act provides the regulatory framework for all offshore petroleum exploration, production and greenhouse gas (GHG) activities in Commonwealth waters. The related OPGGS (E) Regulations require titleholders to undertake their petroleum activity in accordance with an EP accepted by NOPSEMA. This EP has been prepared to meet the requirements of the OPGGS (E) Regulations. Under the OPGGS (E) Regulations titleholders are not required to assess "synergistic, additive, or antagonistic interactions between seismic sound impacts and other stressors". The EP includes a cumulative/additive impact assessment of historic seismic surveys acquired in the vicinity of the proposed Sauropod survey, and surveys that may be acquired concurrently with Sauropod in Section 7.2.</p>
<p>16 The Proposal is to support the extraction of oil and gas for carbon storage activities. Australia's obligations under the Paris Agreement requires that</p>	<p>CGG cannot respond regarding the regulatory process.</p>



#	Comment received	Titleholder response
	<p>closer consideration be given to development proposals that contribute to climate change (both directly and indirectly) and that will produce environmental conditions that impact biodiversity.</p>	

Table 2: 2025 Public comment period comments

#	Comments received	Titleholder response
1	<p>Matter: Impacts to fish/zooplankton - mortality</p> <p>Claims:</p> <ul style="list-style-type: none"> Seismic airguns generate extreme acoustic pulses that can damage fish and zooplankton populations, and disrupt entire food chains 	<p>A comprehensive assessment of the potential effects of seismic noise on zooplankton is provided in Sections 7.1.5 of the EP, using the latest Australian and international research. The predicted maximum distance that zooplankton could suffer mortality is 130 m from the seismic source. While some mortality of zooplankton is possible, the overall consequence is expected to be negligible, and less than natural mortality rates.</p> <p>The potential impacts of noise emissions from the seismic source on fishes and elasmobranchs during the Sauropod 3D MSS are considered to be localised and have no lasting effects on populations. Impacts are primarily expected to be restricted to temporary changes, such as to fish behaviours and local distribution (e.g. avoidance). Overall, the Sauropod 3D MSS is not expected to result in any ecologically significant impacts at a population level for any species of fishes that may be present within or adjacent to the Sauropod 3D MSS.</p> <p>In accordance with the management controls set out in Section 7.1.7, the seismic activity will be managed so that potential impacts and risks to fish and zooplankton are reduced to ALARP and Acceptable levels in accordance with the environmental regulatory requirements for the Sauropod seismic survey. There is no residual or long-term impact expected from routine operations to fish or zooplankton.</p>

2	<p>Matter: Impacts to whales and dolphins</p> <p>Claims:</p> <ul style="list-style-type: none"> Seismic airguns generate extreme acoustic pulses that can deafen whales 	<p>The Operational Area does not overlap a cetacean BIA. The Humpback Whale migration BIA is located 15 km south of the Operational Area and the Pygmy Blue Whale migration BIA is located 72 km north. Therefore, large populations of whales are not expected to occur within the Operational Area, though small numbers are still possible. Further evaluation of the cetaceans expected within the Operational Area and EMBA are further outlined in Section 4.3.6, while the potential risks of seismic survey on cetaceans are outlined in Section 7.1.5.1 of the EP.</p> <p>Based on the timing and duration of the survey, the absence of critical habitats for any species of cetacean (i.e. feeding, breeding, calving areas) or a constricted migratory pathway within the Operational Area and surrounding waters, and the control measures proposed, predicted noise levels from seismic acquisition are not considered likely to cause injury or disturb foraging activity for Pygmy Blue Whales or any other species of large whale that may be present within or adjacent to the Operational Area. The seismic activity will be mitigated to ALARP and Acceptable levels in accordance with the environmental regulatory requirements for the Sauropod seismic survey, as outlined in Section 7.1.7 of the EP.</p>
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# Comments received	Titleholder response
<p>3 Matter: Risks from seismic noise to marine fauna</p> <p>Claim: The risks from seismic blasting in proximity to fish spawning areas, coral reefs and threatened species' habitat are insufficiently addressed</p>	<p>A comprehensive assessment of the potential effects of seismic noise on marine receptors including fish spawning, coral reefs and threatened species habitat is provided in Sections 7.1 of the EP, using the latest Australian and international research.</p> <p>The assessment of the potential effects of seismic noise on fish spawning (Section 7.1.5.7), is assessed over 9 pages and therefore CGG disagrees that the cumulative impact from seismic surveys is not discussed in detail.</p> <p>As there are no known banks, shoals or shallow areas within the Operational Area, the Operational Area is unlikely to support diverse benthic assemblages, such as hard and soft corals, gorgonians, encrusting sponges, seagrass and macroalgae. Nevertheless, potential impacts to benthic invertebrates, including sponges and corals, are assessed in Section 7.1.5.5.</p> <p>The potential effects of seismic noise on threatened species habitat are captured where relevant within the fauna receptor groupings within Section 7.1, including cetaceans (Section 7.1.5.1), marine reptiles (Section 7.1.5.2) and seabirds (Section 7.1.5.3).</p>
<p>4 Matter: Impacts to coastal recreation and tourism industries</p> <p>Claims:</p> <ul style="list-style-type: none"> The Plan also fails to consider... the indirect effects on coastal recreation and tourism industries. 	<p>Impacts to tourism and recreation are captured in the EP. Relevant tourism and recreation receptors are described in Section 4.4.5, and impacts to these receptors are assessed throughout the risk assessment sections (Sections 7 & 8). No tourism activities are known to take place specifically within the Operational Area. Some recreational activities including occasional recreational fishing, scuba diving and snorkelling occur at the Rowley Shoals, although only occasionally due to the remote location. The Rowley Shoals are located outside the Operational Area but within the broader oil spill EMBA. The risk assessment for a hydrocarbon spill from a vessel collision found that no surface sheens or slicks are likely to occur within the waters of the Rowley Shoals Marine Park. As no surface sheens or slicks are likely to occur within the waters of the Rowley Shoals Marine Park, it is highly unlikely that there will be any impacts to socio-economic values of the marine park (i.e. tourism and recreation activities, including fishing and diving/snorkelling charters) (Section 8.2.2.2.8.2).</p> <p>The risk ranking for recreation and tourism receptors was assessed as Low for all risk assessment pathways in the EP.</p>
<p>5 Matter: Inadequate mitigation/control measures</p> <p>Claims:</p> <ul style="list-style-type: none"> The proposed management measures — such as "soft-start" procedures and visual monitoring — are generic, lack enforceable detail, and do not guarantee safety for marine life. There is insufficient evidence that residual risks are low or acceptable. The proposal underestimates the substantial environmental risks and has outlined inadequate measures to reduce harm caused by seismic blasting on a wide range of marine fauna. 	<p>The control measures employed in the EP are standard control measures with proven efficacy. Both visual monitoring and 'soft-start' procedures are consistent with Part A of EPBC Policy Statement 2.1. The ALARP Demonstration in Sections 7 and 8 of the EP has considered additional methods of detecting cetaceans (e.g. Passive Acoustic Monitoring) and survey acquisition is timed to avoid the Humpback whale migration season. Other potential methods for detection (e.g. aerial surveys, additional spotter vessels) have been ruled out as the cost is clearly disproportionate to the benefit gained. This is because of the relatively low densities of whales expected in the Operational Area during survey acquisition and the absence of any overlap between critical habitats (i.e. feeding, breeding, calving areas) or a constricted migratory pathway and the Acquisition Area. The soft-start control means that the airgun array will be started on low power (soft-start). This is likely to alert cetaceans to the disturbance and encourage them to move away before full power is achieved. Adaptive management measures have been implemented to further reduce the already low likelihood of impacts to cetaceans and other fauna. Detail on the Environmental Performance Outcomes, Standards and Measurement Criteria relevant to seismic noise are provided in Section 7.1.9.</p>



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6	<p>Matter: Cumulative impacts</p> <ul style="list-style-type: none"> The Plan also fails to consider cumulative and long-term impacts from repeated blasting The Proposal may overlap with other oil and gas activities in the region, as well as fishing and tourism operations. The combined, cumulative impacts of these activities, including potential spills and emissions, are not adequately assessed in the environmental plan. There is no assessment of synergistic impacts eg. The impact of seismic noise with other environmental stressors (temperature change, pollution) The environmental plan does not consider how cumulative stressors—such as climate change, habitat modification, and invasive species—might exacerbate the risks of the proposed activities Simultaneous activities have the potential to produce additional and cumulative risks that will need to be further assessed. The environmental plan does not consider how cumulative stressors—such as climate change, habitat modification, and invasive species—might exacerbate the risks of the proposed activities. A more comprehensive, integrated approach is required to assess the broader environmental implications and ensure the protection of marine ecosystems. 	<p>Section 7.2 of the EP assesses the potential for cumulative impacts associated with Sauropod 3D MSS being undertaken in an area where other seismic surveys have occurred previously and concurrently (at the same time) as other marine seismic surveys in the areas. There were no seismic surveys identified as potentially occurring within the same EP time frames that have an EP accepted by NOPSEMA or have submitted an EP to NOPSEMA and is currently under assessment, as identified by a review of the NOPSEMA website (Industry environment plans; accessed 30/7/2025) for the activity period of the Sauropod 3D MSS (January to May 2026 or 2027). Thus, only the cumulative impacts of previous seismic surveys were assessed.</p> <p>The EP presents concurrent impact assessment to marine fauna, fish and elasmobranchs, fish spawning, plankton, fish eggs, larvae, benthic invertebrates, and commercial fisheries over 19 pages and therefore CGG disagrees that the cumulative impact from seismic surveys is not discussed in detail.</p> <p>Section 7.8 of the EP discusses the impact of air emissions including the contribution of greenhouse gases (GHG) and pollutants to the atmosphere. It is acknowledged in Section 7.8.2 of the EP that the seismic survey vessel and support vessels present in the Operational Area will generate atmospheric emissions from power generation and waste incineration. Atmospheric emissions have the potential to result in a localized reduction in air quality in the immediate vicinity of the vessel exhaust and to contribute to Australian and global levels of GHG in the atmosphere. Given the low level of emissions anticipated, survey emissions only represent a very small contribution to overall Australian and global GHG emissions to the atmosphere.</p> <p>The OPGGS Act provides the regulatory framework for all offshore petroleum exploration, production and greenhouse gas (GHG) activities in Commonwealth waters. The related OPGGS (E) Regulations require titleholders to undertake their petroleum activity in accordance with an EP accepted by NOPSEMA. This EP has been prepared to meet the requirements of the OPGGS (E) Regulations. Under the OPGGS (E) Regulations titleholders are not required to assess “synergistic, additive, or antagonistic interactions between seismic sound impacts and other stressors”. The EP includes a cumulative/additive impact assessment of historic seismic surveys acquired in the vicinity of the proposed Sauropod survey, and surveys that may be acquired concurrently with Sauropod in Section 7.2.</p>



#	Comments received	Titleholder response
7	<p>Matter: Impacts to commercial fisheries</p> <p>Claims:</p> <ul style="list-style-type: none"> • There is evidence that seismic activity impacts current and future catch rates of commercial fisheries • The oil and gas industry should pay compensation for any damage caused by their activities, such as to fishers who find their catches have suddenly declined. • Seismic has caused impacts to rock lobsters near Tasmania, the females are not fully berried. 	<p>A detailed assessment of the potential effects of seismic sound on fish and fisheries is provided in Sections 7.1 and 7.2 of the EP. Based on the timing and duration (up to 60 days) of seismic acquisition, the potential impacts from the seismic source on commercial catch rates during the Saupod 3D MSS are considered to be slight and short-term. Survey acquisition will be timed to avoid or limit temporal overlap with the spawning periods for key indicator species for commercial fisheries and commercial fishing operations. CGG has determined that compensation for commercial fishers is an appropriate control for the Saupod 3D MSS and will implement the NERA (2021 – Revision 1) CSEP Commercial Fishing Industry Adjustment Protocol (NERA Protocol) to formally manage claims by commercial fishing stakeholders for loss of catch, displacement and lost or damaged fishing gear as a consequence of survey activities.</p> <p>In accordance with the management controls set out in Section 7.1.8, the seismic activity will be managed so that potential impacts and risks to fish and fisheries are reduced to ALARP and Acceptable levels in accordance with the environmental regulatory requirements for the Saupod seismic survey.</p> <p>The potential impacts of the seismic survey on lobsters are outlined in Section 7.1.5.5 of the EP. The latest Australian and international research indicates that there are no likely impacts of seismic activity on adult or larvae lobsters. Furthermore, in accordance with the management controls set out in Section 7.1.8, the seismic activity will be managed so that potential impacts and risks to lobsters are reduced to ALARP and Acceptable levels in accordance with the environmental regulatory requirements for the Saupod seismic survey.</p>
8	<p>Matter: Insufficient data and data gaps</p> <p>Claim:</p> <ul style="list-style-type: none"> • Data gaps exist for the effects of seismic activities on some species and ecological systems • The assessment uses generic data 	<p>To develop the Saupod EP, CGG has considered previous impact and risk assessments for similar activities, relevant published studies (both peer reviewed and grey literature) and stakeholder concerns/feedback. Wherever possible, site-specific and activity-specific data have been used in the impact and risk assessment. However, to address areas of uncertainty, a precautionary approach has been taken and a conservative “worst case” has been applied where there is uncertainty in the level of harm. The precautionary approach requires uncertainty in the analysis to be addressed by using conservative assumptions that may result in a control measure being more likely to be adopted, as discussed in the impact/risk assessment methodology of the EP (Section 6).</p>

Table 3: 2023 Public comment period: Relevant person comments

#	Comment received	Titleholder response
1	<p>There has been inadequate consultation (insufficient time to consult, inconsistent with international best practice) and previously raised concerns regarding impacts to marine parks have not been adequately addressed in the EP.</p>	<p>CGG does not consider from 2/6/23 to 18/10/23 to be insufficient time to review the proposed activity for a relevant person. The relevant person has duplicated their previous query regarding potential impacts to marine life. CGG provided a comprehensive response to the previous query, including section references to where in the EP the queries were addressed. The relevant person also requested information on where in the EP demonstrated impacts to marine parks have been assessed. This information has not changed since the previous response, which was provided again to the relevant person for reference. A request for clarity on what aspects of CGG's response they would like further information on was also included.</p>