NOPSEMA
Australia's offshore energy regulator

STATEMENT OF REASONS

Acceptance of Gorgon and Jansz Feed Gas Pipeline and Wells Operations Environment Plan

Document No: A1335055

Date: 14 May 2026

1. On 26 March 2026, I, [redacted], Director Regulatory Operations – Production Environment, delegate of the Chief Executive Officer of NOPSEMA decided, pursuant to regulation 33 of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023* (**Environment Regulations**), to accept the Gorgon and Jansz Feed Gas Pipeline and Wells Operations Environment Plan (Document No: GOR-COP-0902, Revision 10, dated 27 February 2026) (**EP**) as I was reasonably satisfied that the EP met the criteria in reg 34 of the Environment Regulations.
2. The EP was submitted by Chevron Australia Pty Ltd (ACN 086 197 757) (**titleholder**), to enable the titleholder to undertake the petroleum activity described in the EP, which involves operation of the Gorgon and Jansz feed gas pipeline, wells, and associated infrastructure within Commonwealth Waters.
3. For the purposes of assessing the EP, I was assisted by an assessment team comprised of a lead assessor and two environmental specialists.
4. The reasons for my decision are set out below.

Legislative framework

5. All references to a regulation (**reg**) are to the Environment Regulations unless otherwise stated.
6. All definitions contained in the OPGGS Environment Regulations are applied to those terms used in this statement.
7. The legislation relevant to my decision is set out in the Environment Regulations link.

Background

8. On 23 March 2025, the titleholder submitted the EP (dated 21 March 2025) to NOPSEMA in accordance with the Environment Regulations.
9. On 31 March 2025, NOPSEMA provisionally decided in accordance with reg 27 that the EP included material addressing all of the provisions in Division 2 of the Environment Regulations and published the EP on NOPSEMA's website in accordance with reg 28(1).
10. On 14 May 2025, NOPSEMA requested further information, pursuant to reg 32. The request identified that further information on a number of the criteria in reg 34 was required. In response to this request, the titleholder re-submitted the environment plan incorporating additional information in answer to this request.
11. In addition to the request detailed in [10] above, on 12 December 2025, NOPSEMA offered an opportunity to modify and resubmit the EP to the titleholder. The opportunity identified that the acceptance criteria had not been met. In response to this opportunity, the titleholder resubmitted the EP incorporating modifications pursuant to reg 33.
12. The EP that is the subject of this decision was received on 27 February 2026 (Document No. GOR-COP-0902, Revision 10.0, dated 27 February 2026).

13. On 26 March 2026, I decided to accept the EP. I was reasonably satisfied that the EP met the criteria in reg 34. I explain my reasons in further detail below.

Materials

14. The materials considered in making this decision include, but are not limited to, those set out in **Appendix A** and are referenced where relevant in the reasons below.

Decision Overview

15. The issue before me was whether the EP should be accepted pursuant to reg 33. This required that I be reasonably satisfied that the EP meets the 'acceptance criteria' in reg 34.

16. Further, in accordance with regs 16 and 34, I must not accept an EP unless I am reasonably satisfied that the titleholder is compliant with subsection 571(2) of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (**OPGGS Act**) in relation to the petroleum activity, and the compliance is in a form that is acceptable to me. On review of the titleholder's financial assurance declaration and confirmation forms, I was reasonably satisfied that the titleholder was compliant with section 571(2), and the financial assurance declaration and confirmation forms were acceptable. I therefore considered that the precondition in reg 16 was met.

17. I then considered the criteria in reg 34 and was reasonably satisfied that the EP met those criteria. I therefore accepted the EP. My reasons for this part of my decision are set out at [21] – [73] below.

Should the Environment Plan be accepted?

18. Under the Environment Regulations, in order to accept the EP, I had to be reasonably satisfied that the criteria in reg 34 were met.

19. Regulation 33 requires that, when making my decision as to whether the EP should be accepted, refused or accepted in part or with conditions, I was required to consider the further information that the titleholders provided pursuant to the requests made by NOPSEMA (here, the requests made on 14 May and 12 December 2025). The information the titleholders provided in response to those requests was contained in the re-submitted versions of the EP (as set out at [10] and [11]) which resulted in the final version of the EP (Revision 10.0).

20. Against this background (and having considered the materials in Appendix A), I made the following findings against each criterion for acceptance of the EP in reg 34.

The EP is appropriate to the nature and scale of the activity: regulation 34(a).

21. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(a).

22. I found that the EP (Section 3) contains a suitable description of the activity to inform how it may affect the environment. This is because the scope and bounds of the activity are clearly described in the EP and in such a way that I understood the manner in which the activity would interact with the environment and the limitations of the activity, and therefore what impacts and risks could occur, allowing for an assessment of those environmental impacts and risks. I found that the EP contained an adequate description of the proposed location, spatial extent, timeframe, and duration of the petroleum activities. The EP also described the types and specifications of equipment and property that currently exists on or will be brought into the title areas and used to undertake the activity, as well as the description and where relevant, the composition of property to be removed from the title areas once it is no longer to be used. Examples as to why I was satisfied include but are not limited to:

a. I found that the EP includes a clear delineation of the 'Operational Area' (OA) within Section 3.1.1. Specifically, petroleum titles WA-36-L, WA-37-L, WA-38-L, WA-39-L and WA-40-L as well as pipeline licences WA-19-L and WA-19-PL and a 1.5 km wide corridor either side of these pipeline licences.

b. I found that the EP includes an appropriate geographical description of the OA, noting locations of the Gorgon gas field (approximately 130 km off the north-west coast on Western Australia and 65 km north-west of Barrow Island) and Jansz-Io gas field (approximately 200 km off the north-west coast of Western Australia). Water depths throughout the OA range from approximately 25 m to 1,350 m. A summary of the subsea inventory and indicative locations including wells, manifolds, pipeline termination structures, production pipelines and support infrastructure and infield flowlines is included in Appendix B and displayed in Figures 3-2, 3-3 and 3-4.

c. I found that the EP includes an appropriate temporal description of each phase of the petroleum activity, consisting of ongoing operations of the Gorgon and Jansz-Io production wells and Feed Gas Pipeline infrastructure, commissioning and start-up of infrastructure associated with the Jansz-Io Compression (J-IC) and ongoing inspection, maintenance and repair (IMR) activities. Indicative timing of activities is described in Section 3.1.2 and in the description of individual activities throughout Section 3.

d. I found that the EP includes an adequate level of information of the infrastructure involved in the petroleum activity, including (but not limited to) the subsea hydrocarbon system and associated infrastructure, including the Jansz-Io subsea compression station (SCSt) and Field Control Station (FCS), vessels, helicopters, ROV and AUVs. Section 3.7.1 includes a description of the type and number of vessels that will be used for IMR activities and retrieval/replacement of SCSt modules during ongoing operations.

e. I found that the EP includes an appropriate description of the scope of activities, including those excluded. For example, installation and pre-commissioning activities associated with the J-IC will be undertaken under a separate NOPSEMA-accepted Gorgon Gas Development Pipeline and Subsea Infrastructure Installation and Pre-commissioning Environment Plan (Rev 6.0).

23. I found that the EP contained a thorough description of the activity (Section 3) relevant to the consideration of environmental impacts and risks of the activity with the EP containing an adequate description of each phase of the activity [as listed in [22.c] above]. The EP contained a thorough description of the activity components with the greatest potential to generate impacts and risks to the environment, such as greenhouse gas (GHG) emissions and underwater noise emissions.

a. Examples of this for GHG include:

i. The EP describes key equipment which will have a material influence on the generation of GHG emissions (Section 3). This includes information on the specifications and expected performance of that equipment where relevant.

ii. The GHG emissions that are expected to be generated from major sources are described for each phase of the activity in an appropriately supported emissions inventory (Section 7.6.7). This includes details of expected sources, relevant emissions factors, assumptions made, and identification of appropriate operational contingencies.

iii. The whole-of-lifecycle GHG emissions estimate (Section 7.6.7) is consistent with that detailed in relevant EPBC and State approvals, with refined source estimates based on engineering changes, updated emissions factors, and revised operational forecasts.

iv. The whole-of-lifecycle GHG emissions estimate has been developed based on appropriate methodologies and assumptions (Section 7.6.7.2-3), including expected production rates and product markets.

b. Examples of this for underwater noise emissions include:

i. Noise emissions from vessels undertaking petroleum activities, as described in Section 3.7, including examples of infrequent concurrent vessel scenarios.

ii. Noise emissions from subsea equipment and infrastructure, including the subsea compression station (SCSt). Component noise sources from the SCSt include compressors, pumps, transformers, and piping.

iii. Impulsive noise emission sources, such as side-scan sonar (SSS) and multibeam echo sounders (MBES).

24. I found that the EP clearly describes the environment that may be affected (EMBA) by both unplanned and planned components of the activity, with a logical basis for deriving the boundaries. For example:

a. The EMBA is defined by areas that may be affected by potential emergency conditions in the event of an oil pollution incident, which is conservatively defined through stochastic modelling of the cumulation of various marine hydrocarbon spill scenarios (major defect in flowline or production line (condensate) or vessel collision event (marine diesel oil)). Hydrocarbon exposure values (Table 7-16) used for stochastic modelling align with relevant NOPSEMA guidance.

b. Impact footprints from planned components of the activity have been defined. For example, the titleholder defined an underwater sound EMBA based on the largest sound emission exposure at relevant thresholds from non-impulsive (e.g., vessel and SCSt noise emissions) and impulsive (e.g., IMR acoustic surveys), Sections 7.8 and 7.9, respectively.

25. I found there was a thorough description of the environment that may be affected by the activity with sufficient detail to inform the evaluation of environmental impacts and risks. I considered the level of detail included in the EP to be appropriately scaled to the nature of the impacts and risks. For example, appropriate descriptions of the ecosystem features and EPBC Act-listed threatened and migratory species relevant to the OA and EMBA are included within Sections 4 and 7, with a greater level of detail provided for receptors that may be impacted by planned operations (e.g., underwater noise, GHG emissions) compared with unplanned events (e.g., unplanned hydrocarbon release). For example:

a. In relation to impacts from GHG emissions:

i. The description of the environment addresses climate-vulnerable values and sensitivities in the Australian environment (Sections 4 and 7.6.8 of the EP). The EP uses contemporary scientific information in describing the current climate and predicted future trends.

ii. The impact evaluation specifically identifies the current status and predicted future trajectories of key environmental aspects (Section 7.6). This is informed by relevant contemporary publications such as the CSIRO State of the Climate 2024 Report and the IPCC Sixth Assessment Report.

b. In relation to impact from underwater noise to matters protected under Part 3 of the EPBC Act (Protected Matters), the EP included a detailed evaluation of the potential impacts to marine fauna (Section 7.8 and 7.9), which was informed by the likelihood of the species presence, distribution and behaviour within the area that may be affected (Section 4). The EP

appropriately identified (through contemporary EPBC Act protected matters reports – see Appendix E) key environmental values that intersect the OA, for example (but not limited to), a migration Biologically Important Area (BIA) for the pygmy blue whale.

26. I found that the EP includes sufficient information on the legislative and other requirements (such as laws, codes, standards, agreements, treaties, conventions, or practices) that are relevant to the activity and demonstrates how they will be met throughout the life of the activity (Section 2.5.2). I also found that the EP describes the requirements from policies, plans of management, recovery plans, conservation advice, and other guidance for matters protected under the EPBC Act and demonstrates how these will be met. Specifically, each impact and risk assessment "Demonstration of acceptability" section includes information relating to relevant recovery plans, plans of management, threat abatement plans or approved conservation advice in place for EPBC Act-listed threatened species that may be affected by the activity, summarises the actions from these plans relevant to the petroleum activity and provides rationale to demonstrate where the requirements have been addressed in the EP.

27. I found that a sufficiently robust method, consistent with internationally recognised standard ISO 31000:2018 Risk Management - Guidelines, was applied in the EP for the identification and evaluation of the environmental impacts and risks of the petroleum activity (Section 5). I considered that the detail and rigour applied to the impact and risk assessments (Section 7) is commensurate to the magnitude of the impacts and risks related to the petroleum activity, and that the level of analysis and evaluation is proportionate to the nature and scale of the environmental impacts and risks generated by the petroleum activity. Further detail and rigour are applied in evaluating higher-order planned impacts to key environmental values and sensitivities, such as impacts from underwater noise emissions to cetaceans. For example, impact predictions (Sections 7.8 and 7.9) draw on multiple underwater noise modelling studies and specific acoustic exposure analysis to assess the potential for noise impact pathways from relevant sources associated with the activity, such as vessel noise, acoustic surveys and noise generated by the SCSt.

28. I found that the information provided during relevant persons consultation had been appropriately considered, evaluated, and incorporated into the EP where it was relevant to describe the environment that may be affected by the activity. For example, consultation undertaken with Mardathoonera Cultural Heritage Pty Ltd (MCH) identified marine fauna (such as whales, dugongs, dolphins, and turtles) as species that hold cultural significance. This information has been incorporated into the description of cultural features and values identified through consultation (Table 4-15).

The EP demonstrates that the environmental impacts and risks of the activity will be reduced to as low as reasonably practicable: regulation 34(b)

29. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(b).

30. I found that Section 5 of the EP describes the process applied to planned and unplanned (Section 7) activities to evaluate whether impacts and risks are reduced to ALARP. A clear, systematic, and reproducible process for the evaluation of all impacts and risks is outlined, which details the control measures to be implemented, including an evaluation of additional control measures, and justifies why control measures are either adopted or not adopted, with well-reasoned and supported conclusions, to demonstrate that the environmental impacts and risks of the activity will be reduced to ALARP. I noted that the evaluation of the adoption of control measures is based on environmental benefits and the consideration of the feasibility and cost/sacrifice of implementation.

31. I found that the titleholder applied the environmental risk assessment process (described in Section 5) appropriately for planned and unplanned aspects of the activity. I found that the exploration of alternative, additional, or improved control measures had been evidenced, and that the control measures adopted demonstrate that environmental impacts will be reduced to ALARP. For example, in demonstrating that impacts from light emissions will be reduced to ALARP (Section 7.7), I found that the titleholder evaluated and adopted an appropriate suite of control measures. These include compliance with marine lighting standards required for safety and navigation; implementation of a Light Management Plan incorporating specific controls aligned with the National Light Pollution Guidelines for Wildlife (2023); an activity-specific Hazard Identification and Risk Assessment for marine turtles where night-time activities occur within habitat critical to the survival of marine turtle species; and a seabird management procedure. Additional controls, including the use of curfews and flashing or intermittent lighting in place of fixed-beam lighting, were evaluated but not adopted on the basis that the cost of implementation would grossly outweigh the environmental benefit at this time (Section 7.7).

32. I found that the evaluation of impacts and risks has informed the selection of suitable control measures to either reduce the consequence/severity or likelihood of impacts and risks, and that all types of control measures that could reasonably be considered are evaluated. The control measures outlined in Section 7 of the EP are sufficiently detailed to demonstrate they will be effective in reducing the impacts and risks for the duration of the activity. The level of detail in the ALARP assessment is matched to the nature and scale of the potential impacts and risks. The EP provided a reasonable demonstration that there are no other practical control measures that could reasonably be taken to reduce impacts and risks any further. For example, in relation to the management of the risk of introduction/establishment of invasive marine pests (Section 7.13), I found that the EP adopted an appropriate and sufficiently detailed suite of control measures in alignment with legislative requirements and industry best practice, including (but not limited to) ballast water management in alignment with the Australian Ballast Water Management Requirements, anti-fouling certificates in alignment with Marine Order 98 (Marine pollution – anti-fouling systems) and a Maritime Arrivals Reporting System in alignment with the Biosecurity Act 2015.

33. Of relevance to the management of GHG emissions, I found that the following information in the EP demonstrates that these impacts will be reduced to ALARP:

    a. Control measures contained in the in-force EP have been described in sufficient detail to reflect their ongoing implementation. The controls described address the direct and indirect emissions sources that have been described in the impact evaluation, including direct emissions at the field, emissions resulting from onshore LNG processing within Australia, and indirect emissions resulting from further processing, transport, and end use of the product (in Australia and overseas).

    b. I noted that the EP evaluated what I consider to be reasonable control measures, including those that are developing technologies or in use in other jurisdictions. The ALARP demonstration in the EP was satisfactory as it contains an evaluation of control measures, including those identified by relevant persons consultation, those required under the titleholder's management systems or other legislation, and technologies known to be in use at other facilities or that may be available in the near future.

    c. There is sufficient detail of the control measures to demonstrate that the measures will be effective in reducing impacts and risks to ALARP for the duration of the EP. These include measures undertaken at the offshore field, those required by State approvals at the onshore LNG facilities and other Commonwealth legislation, and measures being implemented at a corporate level.

i. All control measures evaluated are described in Section 7.6.9, and those adopted have been detailed alongside their relevant EPSs and MC. Where applicable, further details of processes have been provided in the implementation strategy for the EP (Section 8).

ii. Sufficient details of the control measures are provided such that they can be implemented, compliance monitoring can occur, and their effectiveness can be evaluated. This detail is provided through the combination of information described in control measures, EPS, and the implementation strategy where relevant.

The EP demonstrates that the environmental impacts and risks of the activity will be of an acceptable level: regulation 34(c).

34. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(c).

35. I found that the EP demonstrates that the environmental impacts and risks of the activity will be of an acceptable level. Examples of some (but not all) matters that I gave significant weight to become reasonably satisfied include:

a. Section 7 of the EP applies a clear, systematic, and reproducible process for demonstrating how environmental risks will be of an acceptable level and the statements and conclusions drawn by the titleholder in the EP have been sufficiently supported with scientific literature. The process is commensurate with the nature and scale of the activity and the severity of its impacts and risks with more effort and rigour applied to evaluations where there is a higher degree of scientific uncertainty in predictions of impacts and risks and/or severity of potential consequence of impacts and risks.

b. Sections 5 and 7 of the EP describe the process undertaken by the titleholder to determine acceptable levels of impact and risk for the petroleum activity. This process involved reflection on internal and external policy settings, feedback received by the titleholder during relevant persons consultation, relevant legislative requirements, applicable plans of management, recovery plans, conservation advice, and other guidance for matters protected under the EPBC Act, and the principles of ecologically sustainable development as defined in the EPBC Act.

c. The EP demonstrates that the petroleum activity is not likely to have a significant impact on matters protected under the EPBC Act, including World Heritage properties, National Heritage properties, Ramsar wetlands, listed threatened species and communities, listed migratory species or the Commonwealth marine area.

d. The EP demonstrates that the activity does not contravene Australian World Heritage management principles, National Heritage management principles, Australian Ramsar management principles or Commonwealth Heritage management principles. There is no spatial overlap of the OA with these protected places.

e. The EP has had regard to relevant policy documents, guidance, bioregional plans, wildlife conservation plans, management plans, instruments under the EPBC Act, conservation advice, marine bioregional plans, and other information on the DCCEEW website. In particular, the EP includes a suitable assessment of the activity against the relevant objectives and action areas in these plans within relevant impact and risk assessments throughout Section 7.

f. The EP demonstrates that the activity is not inconsistent with a recovery plan or a threat abatement plan for a listed threatened species or ecological community, a management plan or IUCN Reserve management principles in operation for an Australian Marine Park or a management plan for a Commonwealth Heritage Place.

g. I found various impact and risk pathways described in Section 7 include an assessment of relevant key documents and demonstrate that the nature and scale of activities described in the

EP will not impact these key receptors in a manner inconsistent with the relevant plans. For example, the titleholder considered the Conservation Management Plan for the Blue Whale (2015–2025) in evaluating the acceptability of underwater noise emissions. The evaluation clearly addresses relevant Action Areas, including Action Area A.2.3 ("Anthropogenic noise in biologically important areas will be managed such that any blue whale continues to utilise the area without injury, and is not displaced from a foraging area"), and provides appropriate rationale to demonstrate that underwater noise from the petroleum activity will be managed in a manner that is not inconsistent with this plan.

h. The titleholder has identified and addressed areas of uncertainty using impact and risk evaluations. Predictions of environmental impact and risk are suitably conservative, supported by appropriate modelling, or subject to measures to validate assumptions and outcomes. For example (but not limited to):

   i. Uncertainty has been addressed in the evaluation of oil pollution incidents through the application of appropriately conservative stochastic modelling and recognition of assumptions made, and the provision for scalability of response arrangements to address spills of different magnitudes. The evaluation of risks posed by spill scenarios includes consideration of potential impacts to the receptors outlined in the description of the environment (Section 4), which has informed the selection of appropriate spill response options (Chevron ABU Consolidated Oil Pollution Emergency Plan, ABU-COP-02788).

   ii. Uncertainty has been addressed in the evaluation of light emissions through consideration of modelling studies and monitoring undertaken by the titleholder, as well as use of a conservative 20 km buffer in alignment with the National Light Pollution Guidelines for Wildlife as a precautionary boundary for potential impact from light emissions.

   iii. Uncertainty in anthropogenic underwater noise was addressed through independent noise modelling studies that considered SCSt source levels at maximum operating conditions and relevant environmental parameters. Modelling assumptions were supported by in situ measurements of received underwater sound levels at various distances and depths from a comparable subsea compression facility in the North Sea. In addition, Factory Acceptance Testing (FAT) of the SCSt compressor units was undertaken, with further in-air noise measurements collected under different operating conditions.

36. In relation to higher order impacts from GHG emissions, the matters which I have given weight to be reasonably satisfied that impacts will be of acceptable levels include:

   a. The EP impact evaluation (Section 7.6) is conducted on the assumption that all emissions predicted for the lifecycle of the activity will be realised; and does not account for potential future emissions reduction through technology or operational refinements. It also does not account for the expected emissions trajectory decline that is currently required by State approvals (Section 7.6.3), will be required through compliance with the Safeguard Mechanism (Section 7.6.1.4), or potential future policy requirements that may apply to emissions from the activity.

   b. The EP contains specific controls (e.g., EPS 6.7 and 6.8) which will collect information to verify GHG emissions estimates and address areas of uncertainty on an ongoing basis. This is supported by suitable performance standards and measurement criteria (MC) to verify that actions are not just implemented, but are also effective, in contributing towards meeting the EP's Environmental Performance Outcomes (EPOs) and ensuring impacts are reduced to acceptable levels.

37. In relation to protected matters under the EPBC Act, I considered that the EP demonstrated that the impacts and risks from underwater noise emissions to cetaceans will be of an acceptable level because of the following (but not limited to) matters:

    a. The EP identifies and addresses uncertainty in impact and risk evaluations through the application of conservative (worst-case) assumptions in the underwater noise assessment.

    b. The EP clearly defines acceptable impact and risk thresholds for underwater noise by committing to no injury, displacement, or disruption of biologically important behaviours of marine fauna within the operational area.

    c. The evaluation of underwater noise impacts and risks (Section 5) incorporates the principles of ecologically sustainable development (ESD) as defined in the EPBC Act, including explicit consideration of acceptability and ESD principles within the impact and risk assessment (Sections 7.8 and 7.9).

    d. The acceptability evaluation appropriately references relevant species recovery plans, conservation advice, and wildlife conservation plans (Sections 7.8 and 7.9), and demonstrates that the activity is not inconsistent with these documents.

38. I found that the EP provided an appropriate evaluation of impacts and risks specific to the nature and location of the activity and relevant environmental receptors. I considered that the evaluation is commensurate with the level of impact or risk presented and provides justifiable conclusions that impacts and risks will be managed to an acceptable level (Section 7). The impact and risk evaluations demonstrate that the acceptable level will be met, and that the EPO will be achieved.

39. I found that information provided during relevant persons consultation had been appropriately considered, evaluated, and incorporated into the EP where it was relevant to demonstrate impacts and risks will be managed to acceptable levels. Section 7 clearly considers information provided during relevant persons consultation in determining acceptability of relevant impact and risk pathways. For example, during consultation, relevant persons identified the potential for impacts to songlines from underwater noise emissions. To address this, intangible cultural heritage (including songlines) has been described and considered in the EP (e.g., Section 4, Section 7.20) and appropriate control measures have been adopted to manage potential impacts and risks from underwater noise emissions to marine fauna, including marine fauna of cultural significance associated with songlines such as whales (e.g., Sections 7.8, 7.9).

The EP provides for appropriate environmental performance outcomes, environmental performance standards, and measurement criteria: regulation 34(d).

40. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(d).

41. I found that Section 7 of the EP contains EPOs, Environmental Performance Standards (EPSs) and MC for impacts and risks of the petroleum activity (and I refer to [21]- [39] above for more detail on these).

42. I found the EP provided appropriate EPOs which I considered, among other things:

    a. Were relevant and addressed all the identified environmental impacts and risks for the activity (as outlined in Section 7).

    b. When read in conjunction with associated EPSs, established measurable levels for management of environmental aspects of the activity.

c. When read in conjunction with the relevant environmental impact and risk evaluations and adopted management measures, will function to demonstrate that acceptable levels of impact and risk and ALARP have been achieved.

d. Are consistent with the principles of ESD and relevant requirements (such as plans of management, recovery plans, conservation advice, and other guidance for matters protected under the EPBC Act), considering items (a) and (c) above. By way of example, EPO-8a which states "No injury to marine fauna from underwater sound emissions associated with the petroleum activity within the OA", is consistent with the Conservation Management Plan for the Blue Whale, which identifies underwater noise as a threat to wildlife.

e. Are consistent with other legislative requirements, such as EPO-6a and -6b which are consistent with the Western Australian management frameworks for GHG emissions (including the requirements of the EP Act and the Ministerial Conditions) and the Safeguard Mechanism.

43. I also found that the EP provided appropriate EPSs that:

a. Contain clear and unambiguous statements of environmental performance. The statements of environmental performance describe how each of the adopted control measures will function and perform to effectively reduce environmental impacts and risks to ALARP and to an acceptable level. For example, EPS 2.1 provides clear statements of performance relating to caution and no-approach zones for vessels around marine fauna (e.g., whales, dolphins, whale sharks, marine turtles, and dugongs).

b. Have clear MC that link to the EPSs and will provide a record that the EPSs have been met. The MC are suitable for verifying that the defined levels of environmental performance are being met, and for the purpose of monitoring compliance. For example, MC 2.1.1 – 2.1.3 provide a clear description of records that will demonstrate relevant training/inductions have been completed by personnel to effectively implement relevant control measures related to interactions with marine fauna, and that any interactions with marine fauna complied with the caution and no-approach zones outlined in EPS 2.1.

44. I considered that the EPOs, EPSs, and MC are clearly linked and complementary of one another, as presented in the 'Environmental Performance Outcomes, Performance Standards and Measurement Criteria' tables relevant to each of the impact and risk pathways evaluated under Section 7 of the EP.

The EP includes an appropriate implementation strategy and monitoring, recording, and reporting arrangements: regulation 34(e).

45. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(e).

46. I found that the implementation strategy includes an appropriate environmental management system (EMS) for the activity (Section 8.1). Section 8 sets out a range of systems, practices, and processes (described further below) that I am satisfied are adequate to ensure all impacts and risks will continue to be managed to ALARP and acceptable levels for the duration of the activity. For example (but not limited to):

a. The EP includes measures to ensure that control measures in the EP continue to be effective in reducing impacts and risks to ALARP and acceptable levels, and monitoring arrangements are in place to determine whether, and ensure that, EPOs and EPSs are being met.

b. The EP includes adequate and effective processes and systems in place to ensure that all impacts and risks continue to be identified and reduced to ALARP and acceptable levels. The implementation strategy includes processes and systems for environmental performance

monitoring, audit, management of non-conformance and review, management of knowledge, learning and change, record keeping, and reporting.

47. I found that the Management of Change (MOC) process was adequately described in Section 8.3.2.2 and was appropriate because:

    a. The EP details the internal management of change procedure that it will follow when assessing changes to the activity. The procedure determines whether a revision of the EP is required and whether that revision is to be submitted to NOPSEMA for consideration.

    b. Changes will be risk-assessed to determine the significance of any potential new environmental impacts or risks not provided for in the EP.

    c. Triggers for changes that require resubmission to NOPSEMA in accordance with regulations 38 and 39 are outlined appropriately.

48. In relation to protected matters and underwater noise emissions, I found that the implementation strategy is appropriate for the nature and scale of the impacts and risks arising from the activity. This is because it contains specific processes and measures which support the continuous management of underwater noise impacts (including from the SCSt) to ALARP and acceptable levels for the life of the activity. For example:

    a. In-water verification of SCSt underwater noise using passive acoustic loggers during commissioning, initial operations, and following compressor module change-out events.

    b. Review of operational data and correlated underwater noise to enable adaptive management of SCSt compressor power loads, ensuring behavioural response thresholds are not exceeded.

49. In relation to GHG emissions, I found that the implementation strategy is appropriate for the nature and scale of the GHG emissions arising from the activity. This is because it contains specific processes and measures which support implementation of the GHG emissions-relevant controls, and which will be used to continuously manage emissions to ALARP and acceptable levels for the life of the activity. Key features relevant to GHG emissions include:

    a. The EP describes the approach to implementing GHG emissions management, reductions, and reporting requirements under the Commonwealth Safeguard Mechanism as well as approvals under the EP Act (WA) and EPBC Act (Cth) (EPS 6.1).

    b. The EP also describes the process for identification and implementation of emissions reduction opportunities on an ongoing basis (EPS 6.2 and EPS 6.9), which will be used to achieve continuous improvement and reduction to ALARP.

    c. In addition, specific measures for managing and addressing uncertainty in relation to indirect emissions are included (e.g., EPS 6.6, 6.7 and 6.8); which are supported by other implementation strategy processes such as MOC (Section 8.3.2.2) and EP review (Section 8.5).

    d. These measures are described in sufficient detail to assure their implementation; and provide clear commitment to reviewing opportunities for improvement over time.

50. I found that the implementation strategy included appropriate measures to ensure that each employee or contractor working on, or in connection with, the activity is aware of their responsibilities in relation to the EP, including during emergencies or potential emergencies, and has the appropriate competencies and training. The key roles and responsibilities of personnel involved in the implementation, management and review of the EP are appropriately outlined in Table 8-1 and the roles and responsibilities for personnel involved in oil spill preparation and response are outlined in Table A of the Oil Pollution Emergency Plan (OPEP). Examples to support my reasoning include:

a. Section 8.2.1.3 outlines the measures that are in place for ensuring employee and contractor competency, including the necessary awareness, training, and induction requirements to fulfil their duties.

b. Appendix G of the OPEP describes the minimum training and competency requirements of the IMT personnel and defines training standards that are aligned with relevant industry good practice, and national and state emergency management training programs.

51. An appropriate OPEP Chevron ABU Consolidated Oil Pollution Emergency Plan (Document No. ABU-COP-02788, Revision 1.5) has been provided that includes arrangements that are suitable, given the spill scenarios presented. Specifically, the OPEP includes adequate arrangements for responding to and monitoring oil pollution. The OPEP includes:

a. The control measures necessary for timely response to an emergency that results, or may result, in oil pollution.

b. The arrangements and capability that will be in place for the duration of the activity to ensure timely implementation of the control measures, including ongoing assurance that response capability is maintained.

c. The arrangements and capability that will be in place for monitoring the effectiveness of the control measures and ensuring that the EPSs for the control measures are met.

d. The arrangements and capability in place for monitoring oil pollution to inform response activities which are summarised in the EP (Section 7.19) and the OPEP.

e. Details of the oil pollution response control measures that will be used to reduce the impacts and risks of the activity to ALARP and an acceptable level, the arrangements for responding to and monitoring oil pollution to inform response activities, the arrangements for updating and testing the oil pollution response arrangements and control measures, and the monitoring of impacts to the environment from oil pollution and response activities.

f. Immediate (first strike plan) response measures establishing the oil pollution response arrangements and control measures in an operational deployment context.

52. I found that the monitoring, recording, and reporting arrangements were adequately described in Section 8.4 of the EP and included routine internal and external reporting requirements and incident reporting arrangements. I considered that these arrangements were appropriate as the information collected will:

a. Be based on the EPOs, controls, standards, and measurement criteria in the EP.

b. Include environmental discharge (as outlined in Table 8-12) reports that record volumes of planned and unplanned discharges to marine environment and atmosphere.

53. I found that the EP provides for appropriate auditing, review, and management of non-conformances of the titleholder's environmental performance and the implementation strategy in Section 8.3.6, to ensure that the EPOs, EPSs, and other commitments in the EP are being met. I found that the risk-based approach to specific assurance activities and field inspections, including hydrocarbon system integrity inspections, conducted as documented in the Gorgon OE Assurance Plan to be appropriate. Non-conformances and subsequent corrective actions will be tracked using a compliance register that details all commitments established in the EP, including those related to EPOs/EPSs, implementation strategy, and ongoing consultation.

54. I found that the EP (Table 8-14) provides for appropriate reporting to NOPSEMA in relation to start and end of activity notifications, the titleholder's environmental performance for the activity, as well as incident reporting (reportable and recordable incidents).

55. I found that the EP provides for the implementation of ongoing consultation arrangements in Section 8.3.4.1 with planned notifications to relevant persons outlined in Table 8-5. I considered these are appropriate to the nature and scale of the activity. In particular, I noted that the titleholder has committed to:

    a. Update relevant persons prior to new or significant changes to activities or impacts/risks occurring.

    b. Provide incident notifications (if required) to potentially affected relevant persons and/or relevant persons who have required emergency event notifications.

    c. During the life of the EP, continuing to accept, assess and respond to post acceptance consultation feedback.

    d. Implement management of knowledge and MOC processes to acknowledge any feedback received from persons or organisations during the life of the EP.

    e. Continue to engagement with First Nations relevant persons via Land Councils, Aboriginal Corporations and representative bodies, including assessment and incorporation of any new information provided on cultural values or features within the EMBA via the Management of Change process detailed in Section 8.3.2.2.

The EP does not involve the activity, or part of the activity, other than arrangement for environmental monitoring or for responding to an emergency, being undertaken in any part of a declared World Heritage Property within the meaning of the EPBC Act: regulation 34(f).

56. For the reason below, I was reasonably satisfied that the EP met the requirements of reg 34(f).

57. I found that the EP clearly described the boundaries of the petroleum activity (Section 3.1.1 and Figure 3-1), which demonstrates that no part of the activity will be undertaken in any part of a World Heritage Property within the meaning of the EPBC Act. The closest World Heritage Property (Ningaloo Coast World Heritage Property) lies approximately 96 km to the southwest of the Operational Area.

The EP demonstrates that the titleholder has carried out the consultations required by Division 3, and the measures (if any) that are adopted because of the consultations are appropriate: regulation 34(g).

58. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(g).

59. Regulation 34(g) has two components which the EP must demonstrate:

    a. First, that consultation has occurred as per the requirements in regulation 25. This requires that the titleholder consults with each ‘relevant person’ as defined in regulation 25(1) and imposes certain requirements for how that consultation is to occur (as specified in regulations 25(2)-(4).

    b. Second, that the titleholder adopted, or proposed to adopt, appropriate measures in light of those consultations.

60. Overall, I must be reasonably satisfied that consultation undertaken was appropriate and adapted to the nature of the relevant persons.

61. I found that the EP provides a clear and suitably detailed description of the consultation processes, and the rationale used to determine who and how to consult with relevant persons, including the approach to the provision of sufficient information and how a reasonable period for the consultation was determined (Section 6).

62. I found that the identification process has provided for a broad capture of relevant persons, such that each relevant person who can be ascertained is identified or could have been identified because:

    a. The process involves consideration of the relevant person categories defined by regulations 25(1)(a), (b), (c), (d) and (e) (Section 6.2).

    b. The process broadly applies the terms of "functions", "interests" and "activities" in regulation 25(1)(d) in a manner that best promotes the objects of the Environment Regulations as reflected in NOPSEMA's 'Consultation in the course of preparing an environment plan guideline' (N-04750-GL2086) (Section 6.2.2).

    c. The process includes reference to multiple sources of information such as publicly available materials, review of databases and registers, published guidance, as well as advice from authorities and other relevant persons (Section 6.2.7).

    d. The process appropriately recognises that a connection of Traditional Owners with Sea Country may constitute an interest for the purposes of regulation 25(1)(d) and involves a range of appropriate and reasonable steps undertaken by the titleholder to ascertain First Nations people/groups with functions, interests or activities potentially affected by the activity (see Section 6.2.7, Tables 6-2, 6-3 and 6-4).

    e. The process includes suitable details and evidence of reasonable measures employed by the titleholder to create public awareness of the petroleum activity and consultation process, so any not readily ascertainable relevant persons could have made themselves known to the titleholder and participated in the consultation process in preparation of the EP (Section 6.2.7.1, Section 6.2.4 and Appendix C). The EP notes that two relevant persons (the Shire of Ashburton and Kufpec) self-identified during the consultation process.

    f. In determining whether the activity may be relevant to authorities, or determining whose functions, interests or activities may be affected by the activity, I found that the titleholder took into account the nature of the activity, description of the environment and the possible environmental impacts and risks of the activity (Section 6.2.7 and Table 6-2).

    g. I found that the EP clearly identifies who are 'relevant persons' under regulation 25(1) for the purpose of Division 3 of the Environment Regulations within Table 6-4, and it contains suitable details, evidence and records to support that the titleholder has carried out consultation with each of those relevant persons in the manner specified in regulations 25(2)-(4) (see [63] – [65]).

63. As required by regulation 25(2), I found that the titleholder gave each relevant person sufficient information to make an informed assessment of the possible consequences of the proposed activity on their functions, interests, or activities. Matters which allowed me to be reasonably satisfied for the purposes of this part of the acceptance criteria, include:

    a. The titleholder informed relevant persons sufficiently about the purpose of consultation, including advising them of the regulatory requirements. For example, the consultation materials provided, raised awareness of and included a link to the NOPSEMA brochure 'Consultation on offshore petroleum environment plans: Information for the community' to help them better understand the responsibilities of titleholders to consult relevant persons in the development of Eps, the purpose of consultation and how relevant persons can provide feedback (Section 6.2.4 and Appendices C and D).

    b. The titleholder provided relevant persons with information relevant for making an assessment about possible consequences of the activity on their functions, interests or activities such as, but not limited to, information regarding the activity proposed under the EP, the EMBA

(including depictions of the modelled EMBA and explaining how the EMBA is determined) and the potential environmental impacts and risks of the activity and proposed control measures (see Section 6.4.2 and Appendices C and D).

c. Relevant persons were provided access to using different mediums and platforms, including by telephone, email, website (https://australia.chevron.com/what-we-do/upcoming-activities), hard copy and electronic materials, social media, in person and virtual meetings (see Sections 6.4.2 and Appendix C). Other examples of the consultation materials include responding to queries and feedback during consultation with relevant persons provided as part of the consultation process, and posters, presentation materials and handouts for use and distribution in face-to-face meetings to convey technical information to different audiences in a clear and accessible way (Section 6.4.2 and Appendix C). A tailored approach to consultation and provision of information was used for different categories of relevant persons (Table 6-1).

d. When relevant persons made requests for additional information, the records of consultation demonstrate that it was provided to them (Appendix D and the Sensitive Information Report). For example:

   i. Where questions were raised by MCH relating to the J-IC, information sheets were provided with further information pertaining to the J-IC (particularly the SCSt) and underwater sound emissions.

   ii. Where questions were raised by the West Australian Fishing Industry Council (WAFIC) relating to impacts of planned discharges, preparation for unplanned events (specifically notifications) and impacts of noise emissions on the marine environment, the titleholder provided further information in relation to these queries.

e. The records of consultation demonstrate that the titleholder provided relevant persons with reasonable, supported and appropriately detailed responses to all of their queries, requests, concerns, objections, or claims raised in consultation (as outlined in Appendix D and further detailed in the sensitive information report).

64. As required by regulation 25(3), I found that the titleholder allowed a reasonable period for consultation with relevant persons. Matters which allowed me to be reasonably satisfied with respect to this include:

a. The EP describes that the titleholder's understanding of what constitutes a reasonable period for consultation is developed on a case-by-case basis, considering relevant guidance for consultation with different categories of relevant persons including Commonwealth and State departments or agencies and First Nations peoples (subject to any alternative timeframe being agreed upon through co-design of consultation) and the nature and scale of the activity (Section 6.2.5). This aligns with NOPSEMA's 'Consultation in the course of preparing an environment plan guideline' (N-04750-GL2086).

b. The titleholder initially contacted most relevant persons about consultation on the activity in July 2024 (i.e., over 18 months before the final submission of the EP to NOPSEMA on 27 February 2026). Some relevant persons (e.g., the Clean Energy Regulator) appear to have been identified by the titleholder later in the consultation process and were first contacted in May 2025. The shortest time that a relevant person had to participate in consultation was approximately 9 months before the final submission of the EP to NOPSEMA on 31 March 2025.

c. At the commencement of the formal consultation period (July 2024), the titleholder contacted relevant persons notifying them of the consultation process and formal consultation period. Emails or letters were sent to relevant persons to invite feedback for the EP, including activity information and outlining how feedback may be provided (Appendix C and the Sensitive

Information Report). Follow up emails were sent in September outlining the closing date for the formal consultation period (October 2024), and additional time was provided for those the titleholder had not received a response from yet.

d. Following changes to the activity schedule for commissioning and start-up for the J-IC, the titleholder contacted relevant persons to inform them of this in December 2024 and provided additional time to make an informed assessment of the updated information by extending the consultation period to February 2025.

e. It is noted that, in the case of consultation with the Clean Energy Regulator (CER), additional information was provided in January 2026, with a response from CER that they had no further feedback in relation to the activity in February 2026, prior to final resubmission of the EP.

f. During the consultation period, the titleholder addressed questions in a reasonably timely manner. The titleholder also proactively sent reminders to relevant persons about impending dates for providing any response(s). Where no comments were received, the titleholder generally followed up with the relevant person during the formal consultation period to prompt them to consider the information materials previously provided and/or confirm whether the relevant person intended to provide feedback (see Appendix D).

65. As required by regulation 25(4), I found that the titleholder advised each relevant person by information sheets and emails that they may request that particular information provided during consultation not be published.

66. In relation to the First Nations people/groups identified as relevant persons under regulation 25(1)(d), some reasons that I considered when forming a view that consultation had occurred in the manner required by regulation 25, included (but were not limited to):

a. The records of consultation reasonably support that the titleholder has provided consultation opportunities and supporting information to relevant First Nations persons and/or representative bodies listed in Table 6-4, in line with the details presented in Section 6.2.4.

b. When contacting First Nations representative organisations, the titleholder clearly expressed that the invitation for consultation on the activity was open to board members, Elders and other relevant members of the organisation (see Section 4.7.8).

c. The titleholder considered availability and accessibility issues and made provision for face-to-face meeting with First Nations people/groups that were consulted (Appendix D).

d. Based on feedback and guidance from First Nations people/groups, consultation by the titleholder was flexible and adaptive to needs, where reasonably practicable and appropriate. For example, when requests were made for additional meetings or further information, the report on consultation demonstrates that these requests were addressed in a reasonable manner (Appendix D). For example, during consultation with MCH, the titleholder attended a number of face-to-face meetings to provide further information relating to impacts and risks from the activity, particularly those MCH had conveyed concerns about such as the impacts of underwater noise on whales.

67. When relevant persons raised objections or claims relating to adverse impacts of the activity or gave other feedback of relevance to the environmental management of the activity, I found that the titleholder provided an assessment of the merits and responses that are reasonable and supported (Appendix D). Accordingly, I conclude that appropriate measures have been, or are proposed to be, adopted in the EP as a result of the consultation that occurred between the titleholder and relevant persons. An example of a measure adopted as a result of consultation is a commitment made to

provide results of in-field sound monitoring, during commissioning of the SCSt, to Buurabalayji Thalanyji Aboriginal Corporation (BTAC), as requested during consultation (Table 8-17).

68. In forming the view at [67] above, I noted there were cases when the objections, claims or feedback by relevant persons did not result in the adoption of any additional measures or changes to the EP. I found that this was a valid response because the titleholder demonstrated that there were already existing measures and/or information in the EP satisfactorily addressing the concerns. For example, during consultation MCH raised claims relating to a number of matters including (but not limited to) underwater noise impacts, climate change, seabed disturbance, decommissioning, emergency event notifications and marine fauna. The titleholder acknowledged that these claims have merit; however, no additional control measures were adopted in response as it was determined that existing information and control measures in the EP were sufficient to demonstrate impacts and risks from the activity will be managed to ALARP and acceptable levels.

The EP complies with the Act and Regulations: regulation 34(h).

69. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of regulation 34(h). I found that the EP:

    a. Is consistent with the Objects of the Environment Regulations, including the principles of ESD. This has been demonstrated through Section 6 to Section 8 of the EP.

    b. Includes an environment plan summary report (Section 1) as required by reg 35(7).

    c. Is consistent with Section 572 of OPGGS Act. Process for maintenance 572(2) and removal 572(3) of property described in Sections 3.6.2 and 3.6.3. The titleholder has considered the NOPSEMA Information Paper: Planning for proactive decommissioning.

70. I found that consultation with relevant persons has informed the titleholder for the purposes of Section 280 of the OPGGS Act which requires that the activity will not interfere with navigation, fishing, conservation of resources of the sea and seabed, other offshore electricity infrastructure and petroleum activities, and the enjoyment of native title rights and interests (within the meaning of the Native Title Act 1993) to a greater extent than is necessary for the reasonable exercise of the titleholder's rights and obligations.

71. I was satisfied that the EP addressed the content requirements of regs 21 to 24 with enough clarity, consistency, and detail commensurate to the nature and scale of the activity. Specifically:

    a. The titleholder has submitted the EP in writing as required by reg 26(6).

    b. The EP commits to complying with the requirements various notifications and reporting to NOPSEMA.

    c. The EP contains a report on all consultations under regulation 25 of any relevant person by the titleholder that is in line with regulation 24(b). In particular:

        i. There is a summary of each response made by a relevant person as required by regulation 24(b)(i). This can be found in Appendix D.

        ii. There is an assessment of the merits of any objection or claim about the adverse impact of each activity to which the EP relates as required by regulation 24(b)(ii). This can be found in Appendix D.

        iii. There is a statement of the titleholder's response, or proposed response, if any, to each objection or claim as required by regulation 24(b)(iii). This can be found in Appendix D.

iv. There is a copy of the full text of any response by a relevant person as required by regulation 24(b)(iv). This is in the sensitive information part of the EP (a discrete part that will not be subject to publication).

72. In relation to the titleholder's report on consultation under regulation 24(b), I found the details presented in the EP to be reasonably accurate and fairly represented, based on a review of the full text records of the consultation between the titleholder and relevant persons, as presented within the sensitive information part of the EP.

73. Lastly, I made no observations of 'sensitive information', meeting the definition provided under regulation 5 or the full text of any response by a relevant person, being contained in the EP. In accordance with regulation 26(8), such information is to be contained in the sensitive information part of the EP only, and not anywhere else in the EP.

Other considerations

The Program: protected matters under Part 3 of the EPBC Act

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

75. In implementing the Program, NOPSEMA conducts assessments of EPs 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 by NOPSEMA during decision making with respect to offshore projects and activities.

76. In accordance with the Program, I considered Matters Protected under Part 3 of the EPBC Act, including listed threatened and migratory species, and was reasonably satisfied that the activity under the EP 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.

b. Appropriate control measures are presented in the EP to ensure that impacts to threatened or migratory species will be of an acceptable level. For example, the inclusion of a number of control measures for management of potential impacts from underwater noise emissions and commitments for verification and ongoing monitoring of noise emissions from the SCSt.

The Program: Cumulative environmental impacts

77. In the context of the Program, cumulative impacts refers 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.

78. 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 (see NOPSEMA's Decision Making Guidelines).

79. I considered the potential for cumulative environmental impacts to the Commonwealth marine area by the activities covered in the EP, as required by the Program, noting the titleholder has evaluated potential cumulative impacts from multiple concurrent vessel operations in the Gorgon or Jansz fields during activities covered under this EP (e.g., IMR and commissioning of J-IC infrastructure) and

other Chevron Gorgon and Jansz EPs (e.g., installation and start-up of J-IC infrastructure, potential drilling and well-intervention). For example, the EP addressed, among other things:

a. Potential cumulative impacts from vessel-based activities occurring in proximity to the SCSt once operational are assessed in Section 7.8. As cumulative underwater noise effects are expected to be spatially and temporally limited, impacts from concurrent operations altering ambient sound levels were assessed as minor.

80. After considering the information presented in the EP, I was reasonably satisfied that, considering the potential cumulative impact factors, the receptors at risk, the nature of the potential concurrent activities and the adopted controls, cumulative impacts were of an acceptable level.

s527E of the EPBC Act: Indirect Consequences

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

82. In assessing the EP, I had regard to section 527E and the Indirect Consequences Policy, in relation to indirect GHG emissions. I gave consideration as to whether the activity is a substantial cause of GHG emissions from the processing, consumption, and combustion of gas, and as an indirect consequence of the activity, whether emissions are facilitated to a major extent by the activity, within the contemplation of the titleholder, and are a reasonably foreseeable consequence of the activities described in the EP.

83. The titleholder has addressed the indirect greenhouse gas emissions (Section 7.6.7.3) that are expected to result from the activity, including the emissions and potential consequences arising from downstream customers (e.g., those arising from combustion and use of the gas product). The relevant evaluation and measures are addressed above throughout this statement of reasons against each relevant EP acceptance criterion.

84. As I have been reasonably satisfied in relation to indirect consequences of GHG emissions under each relevant acceptance criteria above, I consider that the EP adequately addresses the requirements of the Indirect Consequences Policy in relation to NOPSEMA's implementation of the Program.

Other relevant advice received

85. Advice was received from government departments (Department of Climate Change, Energy, the Environment and Water [DCCEEW] and the Clean Energy Regulator [CER]) in relation to GHG emissions management frameworks and their relationship with the activity. This advice was based on information provided to the agencies by NOPSEMA in the form of extracts from the EP and was considered by the decision-maker when considering the GHG emissions topic assessment findings against the acceptance criteria set out above in these reasons.

Conclusion

86. For the reasons set out above, I was reasonably satisfied that the EP met the criteria set out in reg 34. Being satisfied that the titleholder was compliant with s 571(1) (and met reg 16) (refer to [16]), I accepted the EP.

[redacted]

Director Regulatory Operations – Production Environment

Appendix A: Key materials considered in making the decision

1. In making this decision, I considered the documents making up the EP submission in accordance with legislative requirements and NOPSEMA policy and procedure. The material that I had regard to in making this decision included, but was not limited to:

    a. Gorgon Gas Development Gorgon and Jansz Feed Gas Pipeline and Wells Operations (Commonwealth Waters) environment plan (Document No. GOR-COP-0902, Revision 10.0, dated 27 February 2026).

    b. Chevron ABU Consolidated Oil Pollution Emergency Plan (OPEP) (Document No. ABU-COP-02788, Revision 1.5, dated 6 January 2025).

    c. Operational and Scientific Monitoring Plan Environmental Monitoring in the Event of an Oil Spill to Marine or Coastal Waters (Document No. ABU1307004, Revision 8.1, dated 1 September 2023).

    d. Gorgon and Jansz Feed Gas Pipeline and Wells Operations (Commonwealth Waters) environment plan Sensitive Information Report (Document No. GOR-COP-0902, Revision 2, dated 5 February 2026).

    e. Material referenced in the EP that was important evidence for making the case that impacts and risks will be managed to ALARP and acceptable levels, including EPBC Act approvals EPBC 2003/1294 and 2008/4178.

    f. The legislative framework relevant to EP assessments, including:

        i. The OPGGS Act;

        ii. The Environment Regulations; and

        iii. The EPBC Act Program[1].

    g. Policies and Guidelines:

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

        ii. NOPSEMA Environment plan assessment policy (N-04750-PL1347).

        iii. NOPSEMA Environment plan decision making guidelines (N-04750-GL1721).

        iv. NOPSEMA Consultation in the course of preparing an Environment Plan guideline (N-04750-GL2086).

        v. NOPSEMA Section 572 Maintenance and removal of property regulatory policy (N-00500-PL1903).

        vi. NOPSEMA Petroleum activity guidance note (N-04750-GN1343).

    h. Guidance:

        i. NOPSEMA Environment plan content requirements guidance note (N-04750-GN1344).

        ii. NOPSEMA Petroleum activities and Australian marine parks guidance note (N-04750-GN1785).

        iii. NOPSEMA Oil pollution risk management guidance note (N-04750-GN1488).

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

iv. Department of Industry, Science, Energy and Resources, Offshore Petroleum Decommissioning Guideline (2018).

i. Procedures:

i. NOPSEMA Environment plan assessment standard operating procedure (N-04750-SOP1369).

j. Other relevant documents and records, including (but not limited to):

i. Relevant published, peer-reviewed scientific literature.

ii. Advice received from the Clean Energy Regulator (dated 15 December 2025).

iii. Advice received from the Department of Climate Change, Energy, the Environment and Water (dated 19 January 2026).

iv. Department of the Environment, Water, Heritage and the Arts, Significant Impact Guidelines 1.1 – Matters of National Environmental Significance, EPBC Act Policy Statement (2013).

v. Department of Sustainability, Environment, Water, Population and Communities, 'Indirect consequences' of an action: Section 527E of the EPBC Act, EPBC Act Policy Statement (2013).

vi. Department of the Environment and Energy, National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds (2023).

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

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

ix. Department of Agriculture, Water and the Environment, Guidance on key terms within the Blue Whale Conservation Management Plan (2021).

x. Commonwealth of Australia, Threat Abatement Plan for the impacts of marine debris on the vertebrate wildlife of Australia's coasts and oceans (2018).

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

xii. Department of Sustainability, Environment, Water, Population and Communities, Marine Bioregional Plan for the North-west Marine Region (2012).

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

k. Relevant legislative and other requirements that apply to the activity and are relevant to the environmental management of the activity.

l. Relevant Federal Court of Australia authority and issued judgments.