NOPSEMA
Australia's offshore energy regulator

STATEMENT OF REASONS

Acceptance of Gippsland Basin Decommissioning Campaign #1 Execution Environment Plan

Document No: A1350267

Date: 24 June 2026

1. On 1 May 2026, I, [redacted] Director Decommissioning – Environment, delegate of the Chief Executive Officer of the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) decided, pursuant to reg 33 of the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023 (Environment Regulations), to accept the Gippsland Basin Decommissioning Campaign#1 Execution Environment Plan (Document No. DC1-EM-OFS-RPREG-0001, Revision 3, dated 10 April 2026) (the 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 Esso Australia Resources Pty Ltd (ACN 091 829 819) (titleholder), to enable the titleholder to undertake the petroleum activity described in the EP, which involves the removal of the topsides of 12–13 offshore platforms, the removal of the upper jacket sections of 9–10 steel piled jacket facilities and the full removal to seabed of 2 monotowers, and associated preparatory, transport and post-removal survey activities within Commonwealth waters (the removal of the Halibut facility topside and upper jacket section is subject to operational considerations).
3. For the purposes of assessing the EP, I was assisted by an assessment team comprised of a lead assessor, two decommissioning specialists and one stakeholder engagement specialist.
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 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 17 April 2025, the titleholder submitted the EP to NOPSEMA in accordance with the Environment Regulations.
9. On 29 April 2025, NOPSEMA provisionally decided in accordance with reg 27 that the submission included material apparently addressing all the provisions of Division 2 of the Environment Regulations and published the EP on NOPSEMA's website in accordance with reg 28(1).
10. On 6 June 2025, NOPSEMA provided a notice, pursuant to reg 33(1)(b), requesting the titleholder modify and resubmit the EP because NOPSEMA was not reasonably satisfied that the acceptance criteria under reg 34 of the Environment Regulations had been met. In response to this request, the titleholder resubmitted the EP incorporating modifications on 18 September 2025.
11. On 5 November 2025 and 11 March 2026, NOPSEMA made requests for further information, pursuant to reg 32. The requests identified that further information on a number of the criteria in

reg 34 was required. In response to these requests, the titleholder resubmitted the EP incorporating additional information.

12. The EP that is the subject of this decision was received on 10 April 2026 (Document No: DC1-EM-OFS-RPREG-0001, Revision 3, dated 10 April 2026).
13. On 1 May 2026, I decided to accept the EP because 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. 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 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 32(4) requires that, when making my decision as to whether the EP should be accepted, I was required to consider the further information that the titleholder provided pursuant to the requests made by NOPSEMA. The information the titleholder provided in response to the requests was contained in the resubmitted version of the EP, which resulted in the final version of the EP (Revision 3).
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 for the nature and scale of the activity: reg 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 appropriately describes the scope of the activity (Sections 1.2 and 1.3). This includes decommissioning preparatory activities, the types, specifications and composition of property that currently exists on title and that will be removed under the EP (topsides, monotowers, and partial removal of steel piled jackets), transport and transfer activities in Commonwealth waters, the supporting equipment (vessels, remotely operated vehicles [ROVs]) that will be brought into the title area and used to undertake the activity, survey and ongoing

inspection, maintenance and repair (IMR) activities. Removal of remaining lower jacket sections is not part of the scope of the EP and will be covered under a subsequent EP (Sections 1.3 and 2.3).

23. I found that the EP contains a suitable description of the activity to inform how it may affect the environment (Section 2). This is because the scope and bounds of the activity is clearly described in such a way that it is clear how the activity will interact with the environment, and therefore what environmental impacts and risks could occur, allowing for an assessment of those environmental impacts and risks. I found that the EP contains an adequate description of the proposed location, spatial extent, timeframe, and duration of the activities. Further examples as to why I was satisfied include that the EP contains:

    a. a clear description of Campaign #1 decommissioning activities, comprising removal preparations and the removal of the topsides of 12–13 offshore platforms, the removal of the upper jacket sections of 9–10 steel piled jacket facilities, and the full removal to seabed of 2 monotowers, to be undertaken by the Allseas *Pioneering Spirit* heavy lift vessel (HLV) supported by construction support vessels (CSV) (Section 2). The removal of the Halibut topsides and upper jacket sections is contingent on operational conditions; specifically, whether the Halibut facility is required to remain in use for the transport of fluids generated by well plug and abandonment and flushing activities on producing platforms from offshore to the onshore Longford Plant using the HLA600/650 pipeline. If removal of Halibut is not executed as part of Campaign #1, it will be included in a future decommissioning EP (Table 1-1 and Section 2.1). The activity also includes the transit and transfer of removed infrastructure from the HLV to barges/CSV.

    b. a description of removal preparations that will primarily be undertaken by the AllSeas *Fortitude* or similar CSV vessel. These activities include demolition activities (main and cellar above deck equipment), establishing utilities, grouting, installation of lift points, topsides air gapping, strut separation and seabed temporary storage, brace cutting, lifting and transportation preparation activities, securing of loose items/retrieved dropped objects and sea fastening (Section 2.7).

    c. an adequate level of information on the infrastructure to be removed, and the property associated with the activity, including the types of offshore facilities involved and the heavy lift and supporting vessels required to undertake the activity (Section 2).

    d. a clear delineation of the area within which all activities described with in the EP will occur: the Operational Area (OA). The description of the OA includes its location within the Gippsland Basin in Commonwealth waters (Sections 2.2, 2.2.1, 3.1 and Figure 2-2). There is a defined 500 m radius around each of the facilities and an additional 500 m radius vessel exclusion zone for safety (total zone radius of 1000 m around facilities). A temporary 500 m radius vessel exclusion zone will also be implemented around the HLV during transfer activities. Infrastructure will be transferred from the HLV to heavy transport vessels (HTVs) and/or barges, and may be supported by the Allseas vessel *Fortitude*, tugs, and/or another support CSV. The OA includes primary and contingency transfer areas (Figure 2-46). The primary transfer area is in shallower Commonwealth waters offshore Corner Inlet, with contingency transfer areas located at facility infrastructure removal locations. Contingency transfers areas have been allocated either a 5 km or 10 km buffer.

e. an appropriate geographical description of the OA, noting that the activity is located in Commonwealth waters of the Bass Strait off Victoria's Gippsland coast, with water depths of ~20–93 m, and that the surrounding environment, and proximity to key ecological features and other users including the details of relevant values and sensitivities, are described in Sections 2 and 3.

f. an appropriate temporal description of the activity, including the expected campaign timing and sequencing (Section 2.3). The activity is expected to commence in the third quarter 2026 and conclude by the first quarter 2028 following the completion of the as-left survey.

g. an appropriate description of the scope of activities, including those outside of the scope of this EP (Section 1.2). In particular, the EP clearly states that decommissioning of lower jacket sections is excluded and will be addressed in future EP(s). The justification for this phased approach is provided in the EP, and I was satisfied it demonstrates that future removal is not precluded by the current activity and that environmental impacts and risks associated with future removal of remaining infrastructure will continue to be managed to as low as reasonably practicable (ALARP) and acceptable levels (Sections 1.3.1.3 and 1.3.1.4). In particular, full removal of the lower jacket sections will not be precluded due to degradation timeframes, as the removal methodology can be adapted to remove the lower sections as appropriate (Section 1.3.1.3).

24. I found that the EP contains a thorough description of the activity components with the greatest potential to generate impacts and risks to the environment throughout the activity duration, and, appropriately, provides more detail on those components of the activity (Section 2). This includes seabed disturbance, vessel emissions and discharges, underwater sound emissions, introduction or spread of invasive marine species (IMS) and translocation of native species, and potential hydrocarbon spill scenarios. Examples of this include that the EP:

    a. describes heavy lift operations associated with topside and jacket removal and associated vessel activities, which have the potential to generate seabed disturbance, underwater sound emissions, and atmospheric emissions (Sections 2 and 6).

    b. describes vessel operations, including the use of CSVs and associated emissions, discharges, and operational interactions with the marine environment (Section 6).

    c. describes activities that may generate underwater sound emissions and IMS risks, which are subject to detailed assessment informed by specialist activity-specific studies undertaken by relevant subject matter experts (Section 6 and 7, Appendix I).

    d. identifies unplanned events, including hydrocarbon spill scenarios, and provides the basis for assessing potential environmental impacts arising from such events (Section 7, Appendix H).

25. I found that the EP clearly describes the environment that may be affected (EMBA) by both planned and unplanned aspects of the activity, including the unlikely event of a vessel collision leading to a marine gas oil (MGO) spill. The EMBA by unplanned events is appropriately conservatively defined through stochastic modelling of the worst-case spill scenarios. The EP delineated the EMBA based on the:

a. spatial extent to which impacts to ecological and socioeconomic receptors may occur.

b. planning area for scientific monitoring identifying the area within which scientific monitoring may be undertaken in the event of a spill (Section 3.2, Table 3-1 and Appendix A).

26. I found there is a thorough description of the physical, biological, and socioeconomic environment that may be affected by the activity with sufficient detail to inform the evaluation of environmental impacts and risks (Section 3, Appendix A, B, C and D). I considered the level of detail included in the EP to be appropriately scaled to the nature of the impacts and risks.
27. The EP describes environmental values and sensitivities that may be affected by the activity (including matters protected under Part 3 of the *Environment Protection and Biodiversity Conservation Act* 1999 [EPBC Act] and social, economic, and cultural features). These include, but are not limited to, marine fauna (including EPBC Act-listed threatened and migratory species), benthic habitats, commercial fisheries, and cultural heritage values.
28. 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 1.6). This includes consideration of relevant Commonwealth legislation such as the OPGGS Act, the Environment Regulations, the EPBC Act, the *Biosecurity Act 2015*, and the *Underwater Cultural Heritage Act 2018*. I also found that the EP describes the requirements from relevant 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 through the evaluation of impacts and risks (Sections 6 and 7).
29. I found that the EP applied a sufficiently robust method for the identification and evaluation of the environmental impacts and risks of the activity (Section 5). I considered that the detail and rigour applied to the impact and risk assessments (Sections 6 and 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 activity. For example, there was additional detail and rigour to higher consequence risks, including sound emissions and risks from a hydrocarbon spill.
30. The EP describes a framework for identifying control measures to reduce the consequence and/or likelihood of impacts and risks and demonstrates this through the evaluation and selection of control measures (Sections 6 and 7). Control measures are clearly presented where they are adopted, and alternative measures are considered and, where appropriate, not adopted with supporting ALARP justification.
31. 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. The EP demonstrates that information relating to environmental values and sensitivities, including those of social and cultural significance, has been incorporated into the environmental baseline description (Section 3) and has informed the assessment of impacts and risks.

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

32. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(b).
33. Section 5 of the EP describes the process applied to both planned activities (Section 6) and unplanned events (Section 7) to identify and evaluate whether environmental impacts and risks are reduced to ALARP (Section 5.6). I was satisfied that the EP outlines a clear, systematic, and reproducible process for the identification and evaluation of environmental impacts and risks, including identification of control measures, evaluation of additional or alternative measures, and justification for whether control measures are adopted or not adopted. The evaluation of control measures is based on environmental benefit and consideration of practicability of implementation. I was reasonably satisfied that the evaluation of the adoption of control measures is based on consideration of realistic and feasible controls that can reduce the environmental impact and risk.
34. I found that the EP demonstrates that reasonable control measures have been identified, evaluated and either adopted or rejected based on a robust ALARP assessment. The adopted control measures are described in sufficient detail to demonstrate that they are functional, reliable and compatible with other control measures. For example, the EP:

    a. adopts good practice controls to reduce potential impacts from underwater sound emissions to ALARP, including:

        i. compliance with Part 8 Division 8.1 of the EPBC Regulations (IMP13-CM1).

        ii. limiting vessel thruster power to a maximum of 75% (IMP13-CM5).

        iii. applying temporal constraints to avoid HLV operations during indicative peak pygmy blue whale (PBW) season (IMP13-CM4).

        iv. use of trained marine mammal observers (IMP13-CM6).

        v. pre-activity aerial survey (IMP13-CM7).

    b. contains controls to minimise interactions with marine fauna and seabirds, including implementation of vessel management measures, use of non-contact methods to encourage hauled out seals to move into the water to avoid physical interactions, and development and implementation of a Seabird Management Plan (Section 7).

    c. includes implementation of pre-decommissioning and as-removed surveys to demonstrate that impacts have been managed to ALARP (Section 6.1).

    d. evaluates a range of potential control measures for introduced marine species (IMS), including those identified through consultation, and adopts practicable controls to manage marine growth and reduce the risk of transfer of IMS through overboard discharge. The assessment is based on review of historic industry ROV imagery from infrastructure to be removed, information provided from IMS risk desktop studies (Sections 6.12, 7.3 and 7.4), details and ecological characteristics of invasive species, the range of habitat type preferences and depth ranges of invasive species, and known habitat types and distributions within the OA. The EP

includes appropriate control measures for the management of marine growth from removed infrastructure, including returning marine growth to the sea only at removal locations and disposal of marine growth from HTVs and barges onshore.

e. includes consideration of activity-specific supporting studies undertaken by subject matter experts, including desktop studies by Biofouling Solutions (2026), which provides key information to inform the evaluation and selection of control measures for IMS risks (Section 7.4).

f. includes control measures to manage potential impacts and risks of infrastructure remaining post-Campaign #1 execution to ALARP through marking of infrastructure on navigational charts and appropriate navigational aids (e.g. IMP2-CM7, RSK1-EPS6.1, RSK1-EPS7.1), and as-left surveys to verify remaining infrastructure condition following removal activities (Section 2.16).

35. The EP demonstrates that the evaluation of impacts and risks has informed the selection of suitable control measures to reduce the consequence and/or likelihood of impacts and risks. The level of detail in the evaluation is matched to the nature and scale of the potential impacts and risks. The EP provided a reasonable demonstration, which I agreed with, that there are no other practical control measures that could reasonably be taken to reduce impacts and risks any further.
36. Of relevance to the management of higher consequence impacts and risks, I was satisfied that the EP demonstrates that these risks have been reduced to ALARP because:

    a. the EP evaluates a range of control measures, including those identified through relevant persons consultation and those required under legislation, standards, and the titleholder's management system, with the ALARP demonstration including consideration of additional or alternative measures and providing justification where such measures are not adopted.

    b. there is sufficient detail to demonstrate that the adopted control measures are likely to be effective in reducing impacts and risks to ALARP for the duration of the activity.

    c. the EP clearly links control measures to environmental performance outcomes (EPOs), environmental performance standards (EPSs), and measurement criteria (MC), as presented in Appendix K.

    d. sufficient information is provided to demonstrate that control measures can be implemented, monitored, and verified, including through defined measurement criteria, monitoring activities, and reporting processes.

37. In addition, information obtained during consultation has been incorporated into the ALARP demonstration where relevant. For example, in response to consultation with Gunaikurnai Land and Waters Aboriginal Corporation regarding IMS, the EP includes control measure RSK4-CM8, requiring photographic documentation of potential IMS observed on or within marine growth in accessible areas of vessels, providing more contextual information to support ongoing assessments of the presence of IMS on infrastructure being removed. I was satisfied that consultation outcomes have been appropriately considered and have contributed to reducing impacts and risks to ALARP.

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

38. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(c).
39. I was satisfied that the EP demonstrates that the environmental impacts and risks of the activity will be managed to an acceptable level because:

    a. the EP defines acceptable levels of impact based on internal and external context, including legislative and industry standards (Section 5.7). This includes ensuring that impacts and risks are consistent with the principles of ecologically sustainable development (ESD) as set out in section 3A of the EPBC Act.

    b. the evaluation of each impact and risk in Sections 6 and 7 applies this framework consistently, comparing predicted impacts against defined acceptability criteria within 'Demonstration of Acceptability' tables. I found that this comparison is systematic, thoroughly applied, defensible, reproducible, and supported with scientific literature where relevant.

    c. Sections 5, 6 and 7 describe a clear and systematic process for determining acceptable levels of impact and risk, incorporating consideration of legislative requirements, relevant policies and guidance, stakeholder inputs, and applicable recovery plans, conservation advice, and other instruments relevant to matters protected under the EPBC Act. I considered that this methodology is applied in a manner commensurate with the nature and scale of the activity, with greater effort and rigour applied to evaluations where identified impacts and risks were potentially likely to be more severe and/or where there is a higher degree of scientific uncertainty.

    d. the EP demonstrates that impacts and risks to matters protected under Part 3 of the EPBC Act are acceptable, are not likely to result in unacceptable impacts to migratory species or important habitat, are not inconsistent with relevant recovery plans or threat abatement plans, do not contravene plans of management for protected areas, and take into account relevant policy documents, conservation advice and stakeholder inputs. For example, in relation to underwater sound and potential impacts to cetaceans, including PBW (Section 6.13), the EP considers overlap with biologically important areas, has regard to the Conservation Management Plan for the Blue Whale (DoE 2015), and demonstrates that the activity will be managed in a manner not inconsistent with this plan through the adoption of control measures and EPOs (e.g. IMP13-EPO1; Table 6-72). The EP similarly evaluates impacts to southern right whale against the National Recovery Plan for Southern Right Whale (DCCEEW 2024), demonstrating that the activity will not be inconsistent with this Recovery Plan (Table 6-73).

    e. the EP demonstrates that the activity is not inconsistent with EPBC Act requirements and associated policy documents, conservation advice, recovery plans, and bioregional planning frameworks, and that impacts are not likely to result in population-level or ecosystem-level effects based on the predicted levels of impacts and risks.

    f. the EP demonstrates that the activity is planned to be undertaken in a manner consistent with the principles of ESD (e.g. the precautionary principle).

40. The EP identifies and addresses areas of uncertainty within the impact and risk evaluation. Predictions are supported by conservative assumptions, appropriate modelling, established industry practices, and precautionary approaches where relevant. For example:

    a. uncertainty in underwater sound impacts has been addressed through conservative acoustic modelling, including the use of worst-case assumptions (e.g. modelling vessels operating at full installed dynamic positioning thruster power), noting that operational data demonstrates lower actual power usage will be implemented during the activity (Section 6.11.2.5; Appendix I).

    b. uncertainty in planned discharges has been addressed through verification activities during facility preparation, providing opportunities to adapt management measures where required (e.g. IMP5-CM1, IMP6-CM2, IMP7-CM1, IMP8-CM1).

    c. uncertainty regarding the presence of IMS has been addressed through multiple lines of evidence, including specialist studies (Biofouling Solutions 2026), which assess the likelihood of IMS presence on offshore infrastructure to be removed as very unlikely to unlikely depending on species (Section 7.4.3.2.2, Table 7-21), and the adoption of control measures (e.g. RSK4-CM8) to further reduce uncertainty.

    d. uncertainty in hydrocarbon spill modelling has been addressed through adoption of conservative modelling assumptions and credible worst-case scenarios (Section 7, Appendix H).

41. I was satisfied that the EP provides an appropriate evaluation of impacts and risks specific to the nature and location of the activity and relevant environmental receptors. The evaluation is commensurate with the level of impact or risk presented and provides justified and defensible conclusions that impacts and risks can be managed to an acceptable level (Sections 6 and 7). The impact and risk evaluations demonstrate that the acceptable level can be met and that the EPOs can be achieved.
42. Information provided during relevant persons consultation has been appropriately considered, evaluated, and incorporated into the EP where it was relevant to demonstrate that impacts and risks can be managed to acceptable levels. For example, consultation with the Department of Climate Change, Energy, the Environment and Water (DCCEEW) informed updates to the seabed disturbance assessment to include underwater cultural heritage considerations (IMP1-EPO1 and notification requirements for suspected underwater cultural heritage discoveries). I was satisfied that consultation outcomes have been appropriately incorporated into the EP and have informed the acceptability evaluation.

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

43. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(d).
44. I found that Sections 6 and 7 and Appendix K contain appropriate EPOs, EPSs and MC for the activity.
45. I found the EPOs to be appropriate and relevant because:

    a. they are unambiguous and address all the identified environmental impacts and risks of the activity.

b. they are appropriately linked to the outcomes of the ALARP and acceptability assessments undertaken in Sections 6 and 7, thereby establishing a clear connection between identified risks and the required level of environmental performance.

c. when read in conjunction with the relevant environmental impact/risk evaluation and adopted management measures, they demonstrate that the environmental impacts and risks can be managed to ALARP and acceptable levels.

d. when read in conjunction with associated EPSs, establish measurable and enforceable levels for management of environmental performance of the activity.

e. they 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).

f. they address impacts to matters protected under Part 3 of the EPBC Act, including appropriate EPOs relating to cetaceans which ensure that impacts from underwater sound emissions can be managed in a manner not inconsistent with relevant conservation objectives (e.g. IMP13-EPO1).

g. they include commitments to prevent injury or mortality to marine fauna arising from planned discharges and other operational sources such as light emissions (e.g. IMP7-EPO1, IMP8-EPO1, IMP9-EPO1, IMP10-EPO1 and IMP14-EPO1).

h. they include appropriate EPOs for biosecurity risks, including IMS, such as RSK4-EPO1, which requires that there is no introduction to, or spread of, IMS within the OA as a result of Campaign #1 activities.

i. they include EPOs relevant to emergency response, including those associated with oil pollution preparedness and response arrangements, where each response strategy defines environmental outcomes supported by control measures, EPSs, and MC.

46. I found that the EP provides 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 an acceptable level.

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.

47. I found that the EPOs, EPSs, and MC are clearly linked and complementary to one another, as presented within the demonstration of ‘As Low As Reasonably Practicable’ subsections in Sections 6 and 7 of the EP and summarised in Appendix K.

48. I found that the EPOs, EPSs, and MC are clearly identifiable, appropriately structured, and capable of being monitored for compliance. The linkage between EPOs, EPSs and MC is logical, unambiguous and supports implementation and assurance that environmental performance commitments can be achieved.

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

49. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(e).
50. The EP contains a description of the titleholder's Environmental Management System for the activity, which is ExxonMobil's Operations Integrity Management System (OIMS), aligned with ISO 14001:2015 Environmental Management Systems (Section 8.15).
51. I found that the implementation strategy provides systems, practices and processes which provide for all impacts and risks to continue to be managed to ALARP and acceptable levels for the duration of the activity (Section 8).
52. I found that the Management of Change process is adequately described (Section 8.13). The process is appropriate because:
    a. an impact/risk assessment will be undertaken to ensure that impacts and risks from the change can be managed to be ALARP and managed to an acceptable level.
    b. risk assessment outcomes will be reviewed as to whether a revision is required under reg 39(2).
    c. it supports ongoing improvement by enabling consideration and incorporation of changes arising from operational experience and performance review.
53. I found that the implementation strategy includes appropriate processes and controls to support management of the key environmental aspects of the activity, commensurate with the nature and scale of Campaign #1 decommissioning activities. These include:
    a. controls for vessel-based operations, including management of discharges, emissions, and interactions with the marine environment.
    b. monitoring processes to confirm that environmental performance requirements are achieved, including verification of emissions and discharges (Section 8.11.5 and Table 8-5).
    c. recording and reporting systems to ensure that environmental performance can be tracked and managed throughout the activity (Section 8.11.5).
54. I found that the implementation strategy to be appropriate as it includes measures to ensure that each employee or contractor working on, or in connection with, the activity is aware of their responsibilities in relation to the 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 outlined in Section 8.2.1 and the roles and responsibilities for personnel involved in oil spill preparation and response are outlined in the Oil Pollution Emergency Plan (OPEP).
55. I found that the implementation strategy is appropriate for managing unplanned events, including hydrocarbon spill risk associated with vessel operations. Key features include:
    a. integration of spill prevention, preparedness and response controls within the EP and the activity-specific Emergency Preparedness and Response Plan, including the Oil Pollution Emergency Plan (OPEP) (Section 8.16.1).

b. provision of an Emergency Preparedness and Response Plan (Attachment 2), which includes the OPEP and Bass Strait Operational and Scientific Monitoring Plan.

c. defined arrangements for response to oil spill events, including deployment of response resources and implementation of response strategies commensurate with identified spill scenarios.

d. alignment with regulatory requirements for oil pollution preparedness and response.

56. I found that the implementation strategy includes appropriate measures to ensure that personnel working on, or in connection with, the activity understand their responsibilities and have the necessary competencies to implement the EP. This includes:

a. clearly defined roles and responsibilities for EP implementation (Section 8.2.1).

b. training and competency requirements for titleholder personnel, contractors and third parties, including activity-specific training such as environmental inductions, marine mammal observer training, and oil spill response training (Section 8).

c. arrangements to ensure that personnel are appropriately trained and competent before undertaking relevant tasks.

57. I found that an appropriate OPEP has been provided as part of the Emergency Preparedness and Response Plan (Section 8.16.1, Attachment 2), which contains arrangements suitable for the spill scenarios identified in the EP and meets the requirements of regs 22(8) and 22(9). The OPEP includes:

a. response arrangement consistent with the national system for oil pollution preparedness and response.

b. arrangements and capability to support effective implementation of response measures.

c. control measures necessary for timely response to an oil pollution incident.

d. arrangements for monitoring the effectiveness of response measures and environmental outcomes.

e. monitoring processes to inform response activities.

f. defined response strategies to reduce impacts to ALARP and acceptable levels.

g. arrangements for rapid mobilisation of response capability.

58. I found that the EP includes a structured program of testing, exercises, and drills to ensure oil spill response capability is maintained and effective (Section 8.16.3). This includes:

a. testing prior to the commencement of the activity.

b. testing following significant amendments to relevant documents.

c. testing at intervals not exceeding 12 months where applicable.

d. campaign-specific testing aligned with the activity, including implementation through the Esso–Allseas emergency response bridging document and the annual Emergency Preparedness and Response Activity Plan.

59. I found that monitoring, recording, and reporting arrangements are adequately described (Section 8.11). These include internal and external reporting requirements, aligned with the Environment Regulations (Section 8.11.6 and Table 8-6), as well as arrangements for monitoring emissions and discharges (Section 8.11.5 and Table 8-5). These arrangements are appropriate as the information collected will:

    a. be based on the EPOs, control measures, EPS, and MC defined in the EP.

    b. include records of environmental performance and any planned or unplanned discharges to the marine environment and atmosphere.

60. I found that the EP provides appropriate arrangements for auditing, review, and management of non-conformance (Section 8.11.4). This includes processes to review environmental performance, confirm implementation of control measures in accordance with EPSs, identify non-conformances and opportunities for improvement, and ensure prompt action and appropriate corrective measures can be taken.
61. The EP provides for ongoing consultation arrangements (Sections 4.5 and 8, Table 4-13) and I was satisfied these arrangements, as required by reg 22(15), are appropriate because they:

    a. include all relevant authorities and stakeholders.

    b. include mechanisms to ensure that relevant persons are informed of the activity and any changes or incidents.

    c. allow for ongoing engagement and consideration of feedback throughout the life of the EP.

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: reg 34(f)

62. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(f).
63. I found that the EP clearly describes the boundaries of the activity (Section 2) and 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 (Section 3.3, Appendix A, Appendix B, Appendix C and Appendix D).

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: reg 34(g)

64. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(g).
65. Regulation 34(g) has two components which the EP must demonstrate:

    a. First, that consultation has occurred as required by reg 25, including consultation with each ‘relevant person’ and in the manner prescribed by regs 25(2)–(4).

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

66. Overall, I must be reasonably satisfied that consultation undertaken was appropriate and adapted to the nature of the relevant persons.
67. In determining whether the consultation requirements set by reg 34(g) had been met, I had regard to the titleholder's consultation methodology in Section 4, Appendix E, Appendix F, and the Sensitive Information Report part of the EP.
68. I found that the EP provides a clear and suitably detailed description of the consultation process, and the rationale used to identify relevant persons and how to consult with relevant persons. These descriptions included the approach to providing a reasonable period of time to engage in the consultation process.
69. I found that the EP described a clear process for the identification and broad capture of relevant persons in accordance with reg 25(1). This is because:

    a. the process provided for the identification of relevant persons within all the categories of relevant persons defined by reg 25(1)(a)–(e). The relevant person identification methodology for a suitable range of categories was presented (Section 4.3.2.2 and Table 4-3).

    b. identification and classification of relevant persons within those boundaries in accordance with the Environment Regulations (Section 4.2.4), including clear justification of relevant persons and assigned consultation levels (Appendix E-1), and provision for self-identification (Section 4.2.2).

    c. the process provided for the terms, 'functions', 'interests', and 'activities' for the purpose of identifying relevant persons under reg 25 to be interpreted and applied broadly by the titleholder in a manner consistent with the interpretation of those terms in NOPSEMA's 'Consultation in the course of preparing an environment plan guideline' (N-04750-GL2086). A description of the functions, interests, or activities of those persons or organisations identified as relevant persons under reg 25 is included in Appendix E-1.

    d. the process included additional details on how the titleholder's process identified First Nations relevant persons, through engagement with First Nations representative organisations and review of the titleholder's existing database (Section 4.2.4).

    e. there was verification of relevant person details prior to consultation (Section 4.2.6).

    f. consultation was undertaken in accordance with assigned consultation levels (Section 4.2.7).

70. I found, that as required, relevant persons were provided with sufficient information to enable an informed assessment of the possible consequences of the activity on their functions, interests, or activities. For example:

    a. The process included details and evidence of the steps taken by the titleholder to create awareness of the activity and the consultation process and to encourage potentially relevant persons that the titleholder may not be aware of to make themselves known to the titleholder (Section 4.2). The steps taken by the titleholder included advertising in national, state, and local newspapers, holding community drop-in sessions and including content on Esso's online Consultation Hub (Section 4.2.2 and Appendix E-2).

    b. Flexibility was provided in the methods of engagement, including written and telephone correspondence, online meetings and face-to-face engagement.

c. There was provision of sufficient detail regarding the nature of the activity, the environment that may be affected and the associated impacts and risks.

d. The provision of responses to queries and requests for further information during the consultation process (Appendix E-2).

71. Given the period of time afforded by the titleholder for consultation and the evidence of engagements with relevant persons, including multiple opportunities for the relevant persons to provide information to the titleholder, I was satisfied that a reasonable period for the consultation was given.
72. I found that the consultation process allowed sufficient time (minimum of 60 business days) for relevant persons to consider the information provided and respond, including flexibility to accommodate requests for further information or additional engagement.
73. I found that consultation included multiple engagement points, follow-ups, and opportunities for feedback, supporting the view that reasonable efforts were made to facilitate effective participation by relevant persons.
74. I found that the EP demonstrates that consultation materials and processes were appropriately managed, and that relevant persons were informed that they may request that particular information provided during consultation not be published. Information subject to such a request was not published, in accordance with reg 25(4). The titleholder provided these notifications through the information sheets, in specific written correspondence, and at meetings (e.g. Appendix F-1).
75. I found that where objections or claims were raised by relevant persons, the EP demonstrates that these were assessed for merit, and responses were provided that are reasonable and supported.
76. I found that the report on consultation (Section 4.6 and Appendix E-2) includes a summary of each objection or claim, an assessment of its merit, the titleholder's response and identification of any measures adopted as a result of consultation. I considered that the titleholder's assessment of the merit of, and responses to, objections and claims were reasonable and supported, and the measures adopted because of the consultation were appropriate. For example:

    a. The titleholder identified claims and objections raised by relevant persons and assessed the merit of each objection or claim about the adverse impact of the activity described in the EP. The assessment of merit subsequently informed the titleholder's response or proposed response to the relevant person's objection or claim. The report contains a statement of the titleholder's response, or proposed response, if any, to each objection or claim. Where there was a claim or objection identified, the titleholder provided a response which I considered adequate to each objection or claim that has been raised.

    b. In some cases, the titleholder's assessment of the merits of objections and claims resulted in the adoption of control measures to demonstrate that impacts and risks can be reduced to ALARP and acceptable levels (e.g. see [78] of these Reasons).

    c. Objections and claims were made which related to the activity and future plans for the remaining steel pile jacket end states and ecological risks resulting from delays to removal of infrastructure, for example a letter from The Wilderness Society to Esso dated 1 August 2025

(Appendix E-2). Where concerns were raised – specifically in relation to the steel pile jacket end states and delay of removal – the titleholder responded, with content reflected in the EP, noting that:

i. the EP does not propose to permission an end state for lower jacket sections, and that a future EP including steel pile jacket removal planning and end states will be submitted (e.g. execution EP for removal of lower sections of the jackets to be submitted in 2029/2030; Section 1.3.1.4).

ii. removal of topsides and upper jacket sections does not impact the ability to fully remove lower jacket sections in the future (e.g. Section 1.3.1.3).

iii. the topsides and upper jacket sections which may contain contaminants, and the integrated jacket leg tanks that have previously been used for hydrocarbon storage will be removed as part of Campaign #1 activities. As such, remaining structures are predominantly carbon steel and grout (in the annulus between the jacket), with some piles containing titanium-iron oxide mineral sand, no impact to the environment as a result of material degradation is predicted within the timeframe of the EP (Section 2.17).

77. I considered that the nature of the activity, the environment, and the possible impacts and risks of the activity were appropriately taken into account by the titleholder in determining whether the activity may be relevant to authorities and departments under reg 25(a), (b) and (c), or determining whose functions, interests, and activities may be affected under reg 25(d). This is because the titleholder considered:

a. the nature and scale of the activity and the possible impacts and risks of the activity when determining who to consult with.

b. all the known environmental values and sensitivities in the EMBA by the planned and unplanned impacts and risks of the activity when determining relevant persons (Figure 4-1, Section 4.2 of the EP).

78. I was satisfied that appropriate measures have been adopted, or are proposed to be adopted as a result of consultation. I found that information gathered through the consultation process was appropriately incorporated into the EP and effectively informed the identification of environmental values and sensitivities to ensure impacts and risks are reduced to ALARP and acceptable levels. This is because the information provided by relevant persons throughout the consultation process assisted the titleholder to ascertain, understand, and address all of the environmental impacts and risks that might arise from its proposed activity. This includes:

a. updates to the assessment of seabed displacement to include consideration of underwater cultural heritage and the introduction of control measures (e.g. IMP1-CM1) to ensure impacts are reduced to ALARP and acceptable levels.

b. the adoption and partial adoption of control measures to manage IMS (IMP12-CM1, IMP12-CM2, IMP12-CM3 and IMP12-CM4) in response to consultation feedback from the DCCEEW Sea Dumping team and Parks Victoria.

79. I also note that in some cases, consultation did not result in the full adoption of additional measures and was satisfied that this was appropriate as the EP demonstrated that existing control measures already adequately addressed the matters raised.
80. In reviewing the consultation summary report (EP Appendix E-2) and records provided in the Sensitive Information Report, I found that:
    a. the consultation process considered the established and ongoing operational presence of the titleholder, and previous consultation undertaken for this and other activities in the region.
    b. a targeted, repeated, and reasonable effort was made to engage with specific persons or groups of relevant persons in order to elicit a response and engage with the process.
    c. the titleholder provided an appropriate assessment of the merit of, and all responses to, objections and claims (Appendix E-2). I considered that all objections or concerns regarding the proposed activity were reasonably responded to, addressed or incorporated into the EP as a result of the consultation process.
81. I found that the EP commits to ongoing consultation (Section 4.5). I considered this was an appropriate measure which would ensure that any future feedback, objections, or claims which may arise from relevant persons would be assessed and reported.

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

82. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(h).
83. I was satisfied that the EP addresses the content requirements of the Environment Regulations with clarity, consistency, and a level of detail commensurate with the nature and scale of the activity. Specifically, the EP:
    a. was submitted in writing in accordance with the relevant regulatory requirements.
    b. includes commitments to comply with applicable notification and reporting requirements to NOPSEMA.
    c. contains a report on consultation that meets the requirements of reg 24(b), including:
        i. a summary of each response provided by a relevant person (Appendix E-2).
        ii. an assessment of the merits of any objection or claim about adverse impacts (Appendix E-2).
        iii. a statement of the titleholder's response, or proposed response, to each objection or claim (Appendix E-2).
        iv. supporting consultation records contained within the sensitive information component of the EP, consistent with regulatory requirements.
84. I also found that the EP:
    a. clearly delineates information as being relevant to either Commonwealth or Victorian state waters given the cross-jurisdictional overlap of the activity.

b. is consistent with the objects of the Environment Regulations, including the principles of ESD.

c. includes an EP summary as required by reg 35(7) (Section 1.7).

d. acknowledges and commits to complying with applicable notification and reporting requirements of the Environment Regulations relevant to the activity, including those in regs 47, 48, 49, 50, 51, 52, 53 and 54 (Section 8.11, Table 8-5 and Table 8-6).

e. contains information meeting the definition of 'sensitive information' under reg 5 only within the sensitive information part of the EP. In accordance with reg 26(8), such information is not included within the main body of the EP.

85. I found that the EP is consistent with section 572 of the OPGGS Act because:

a. the large-scale Campaign #1 execution activity includes the removal of property within the scope of the EP that is neither used nor to be used in connection with operations (Section 2).

b. the activity is planned within a defined timeframe and describes a staged decommissioning approach, including removal of property as part of Campaign #1, with further activities addressed in subsequent EP(s), which provides operational flexibility to undertake removal activities while managing environmental risks (Section 2.3).

c. the EP includes sufficient information to demonstrate that the environmental impacts and risks associated with lower jacket sections remaining following Campaign #1 execution will be ALARP and of an acceptable level. For example, no impacts to the environment are predicted as a result of material degradation within the timeframe of the EP (Section 2.17) because:

   i. the majority of platform components will be removed as part of Campaign #1, and remaining materials will predominantly be carbon steel and grout (Section 2.17, also see [76] of these Reasons).

   ii. an activity-specific materials degradation study undertaken by relevant subject matter experts (Kent Plc 2022) predicts slow corrosion rates (~0.1 mm/year) for the lower jacket sections (e.g. Sections 1.3.1.3, 2.17 and 2.18), with the first significant degradation (the potential initial failure of the smallest jacket components) predicted to occur within the range of ~50–120 years following the removal of cathodic protection (Section 2.18.1.1).

d. future removal of the lower jacket sections down to the seabed will not be precluded as a result of activities undertaken as part of this EP. This is because:

   i. materials degradation timeframe estimates indicate that there is no risk to the integrity of the lower jacket sections while inspections, contracting, engineering and regulatory permissioning is completed for their future removal, proposed to commence in 2032 (Sections 1.3.1.3 and 1.3.1.4).

   ii. the specific removal methodology for the lower jacket sections can be adapted to consider the individual structure, with all potential removal approaches standard in the global decommissioning industry and no removal options will be precluded or become disproportionally challenging due to any of the activities contained within the EP

(Section 1.3.1.3). The specific removal approaches will be informed by a detailed internal inspection program post-Campaign #1 execution (Section 1.3.1.3).

e. the EP describes the potential for an alternative end state for the lower jacket sections to be pursued (e.g. Section 1.3.1.4), however the EP includes a clear pathway and timeframes for full removal of these structures so I was satisfied that planning for decommissioning was being undertaken in parallel to any titleholder decision for an alternative end state. The future arrangements are outside of the scope of the EP and will be subject to future permissioning documents (Section 1.3).

f. the EP provides decision criteria for jacket cutting for Whiting, Bream A and Fortescue, demonstrating that adaptive management in terms of infrastructure removal can be implemented should obstructions or unsuccessful sediment displacement attempts be encountered, options such as chain cutters, buckets or rippers may be utilised to remove obstructions from cut locations (Section 2.7.6).

g. no approval for leave in situ end states has been granted through this EP. I recognise that the remaining steel piled jacket sections will be included in a future EP to be submitted by the titleholder (e.g. execution EP for removal of lower sections of the jackets to be submitted in 2029/2030; Section 1.3.1.4).

Other considerations

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

86. 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.
87. 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 matters protected 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.
88. 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 EP demonstrates that the activity will not occur within, and therefore will not contravene plans of management for, any World Heritage Area, National Heritage Place or Ramsar wetland (Appendix A.1.1 – Sections A.1.1.1–A.1.1.4). I also noted that related Campaign #1 activities outside the scope of this EP that interact with the Corner Inlet Ramsar site have been assessed separately under the EPBC Act and were determined to be ‘not a controlled action if taken in a particular manner’.

b. 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.

c. appropriate control measures are presented in the EP to ensure that impacts and risks to matters protected under Part 3 of the EPBC Act will be of an acceptable level, including, but not limited to:

   i. controls to minimise interactions with marine fauna and seabirds, including implementation of vessel management measures such as compliance with requirements established in Part 8 Division 8.1 of the EPBC Regulations, alignment with the Australian National Guidelines for Whale and Dolphin Watching 2017 (Commonwealth of Australia 2017), use of non-contact methods to encourage hauled out seals to move into the water when needed to facilitate access to or lifting of a structure, and development and implementation of a Seabird Management Plan (Section 7).

   ii. measures to manage underwater sound emissions from the activity to reduce the risk of injury and disturbance or displacement to marine fauna (Section 6.13 and Appendix K). These include limiting HLV and CSV vessel thruster power to 75%, avoidance of operations during indicative peak PBW season, marine mammal observations from the HLV during daylight hours, and a pre-activity aerial survey.

   iii. no planned anchoring of vessels (IMP1-CM2) and utilisation of internal cutting methods in preference to external cutting methods where jackets are to be cut below seabed to minimise the volume of seabed required to be displaced (IMP-CM-3) (Section 6.1).

   iv. oil spill preparedness, and response arrangements, including an activity-specific Emergency Preparedness and Response Plan, with appended appropriate OPEP and Operational and Scientific Monitoring Plan, which provides response strategies and prioritisation of sensitive environmental receptors within the EMBA (Sections 7 and 8, and Attachment 2).

   v. biosecurity and vessel assurance controls to minimise the risk of introduction of marine pests, including compliance with applicable legislation and management of ballast water and biofouling, thereby protecting ecological values and species within the Commonwealth marine area (Section 7.4).

   vi. notification and communication measures to inform marine users and reduce the risk of vessel interactions, thereby indirectly reducing risks to protected species and habitats (Table 4-13 and Section 7.1).

89. I found that these measures, in combination, are proportionate to the nature and scale of the activity and ensure that impacts to protected matters are localised, temporary and do not result in population-level or ecosystem-level effects.

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Conclusion

90. 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 section 571(1) (and met reg 16), I accepted the EP.

[redacted]

Director Decommissioning – 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. Gippsland Basin Decommissioning Campaign#1 Execution Environment Plan (Document No. DC1-EM-OFS-RPREG-0001, Revision 3, dated 10 April 2026)
   b. Decommissioning Campaign#1 Execution Environment Plan Emergency Preparedness and Response (Document No. DC1-EM-OFS-RPREG-0002, Revision 3, dated 13 January 2026)
   c. Gippsland Basin Decommissioning – Campaign#1 Execution Environment Plan Sensitive Information Part (Document No. DC1-EM-OFS-RPREG-0001 Attachment 1, Revision 2, undated)
   d. The legislative framework relevant to EP assessments, including:
      i. The OPGGS Act
      ii. The Environment Regulations
      iii. The EPBC Act Program[1].
   e. NOPSEMA Policies and Guidelines:
      i. Assessment policy (N-04000-PL0050).
      ii. Environment plan assessment policy (N-04750-PL1347).
      iii. Environment plan decision making guidelines (N-04750-GL1721).
      iv. Consultation in the course of preparing an Environment Plan guideline (N-04750-GL2086).
      v. Section 572 Maintenance and removal of property regulatory policy (N-00500-PL1903).
      vi. Petroleum activity guidance note (N-04750-GN1343).
   f. Guidance:
      i. NOPSEMA Environment plan content requirements guidance note (N-04750-GN1344)
      ii. NOPSEMA Petroleum activities and Australian marine parks guidance note (N-04750-GN1785)
      iii. NOPSEMA Oil pollution risk management guidance note (N-04750-GN1488).
      iv. Department of Industry, Science, Energy and Resources, Offshore Petroleum Decommissioning Guideline (2022)
      v. Department of Industry, Science and Resources, Australia's Offshore Resources Decommissioning Roadmap (2024)

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

g. Procedures:

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

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

   i. Relevant published, peer-reviewed scientific literature

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

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

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

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

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

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

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

   ix. Department of the Environment, South-East Marine Region Profile (2015)

   x. Director of National Parks, South-east Marine Parks Network Management Plan 2025 (2025)

   xi. Threatened Species Scientific Committee, Listing Advice Megaptera novaeangliae Humpback Whale (2022)

   xii. Department of Climate Change, Energy, the Environment and Water, National Recovery Plan for the Southern Right Whale (2024)

   xiii. Threatened Species Scientific Committee, Conservation Advice Balaenoptera borealis (sei whale) (2015)

   xiv. Threatened Species Scientific Committee, Conservation Advice Balaenoptera physalus (fin whale) (2015)

   xv. Department of the Environment and Energy, Recovery Plan for Marine Turtles in Australia 2017-2027 (2017)

   xvi. DEWHA Approved Conservation Advice for Dermochelys coriacea (Leatherback Turtle) (2008)

   xvii. Department of Sustainability, Environment, Water, Population and Communities, Recovery Plan for the White Shark (Carcharodon carcharias) (2013).

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

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