
From: [REDACTED]
Sent: Tuesday, 12 March 2019 1:27 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Urgent: NOPSEMA follow up on communicating Greenhouse gas emissions treatment in assessment and decision making [DLM=For-Official-Use-Only]

Importance: High

For Official Use Only

Hi [REDACTED] and [REDACTED]

As you know we are trying to get up to speed as quickly as possible with your expectations relating to the treatment of GHG emissions for offshore petroleum projects under the EPBC Act and as relevant to assessments under the Program. We have a decision due this Friday relating to potential publication of the Scarborough OPP which requires us to seek additional information from Woodside relating to their GHG emissions.

We have drafted a proposed request for information from Woodside, for your review as soon as possible please, in order to test our understanding of how GHG emissions should be treated by the proponent in their OPP/EIS documentation. Could you please review the draft text provided and let me know if this meets your expectations with regard to the treatment of direct and indirect emissions originating from the Scarborough Project? If you are able to provide a response prior to lunch time on Thursday (AEST) it would greatly appreciated! Please also feel free to give me a call to discuss

Please note that an official request for review of the proposed text was also sent by Cameron Grebe earlier today through to James Tregurtha (copied below), so this email is really to serve as quick heads up before the request filters down to you as we are on a short time frame.

Cheers

[REDACTED]

Proposed draft text for inclusion in the formal 'Request for Further Written Information' text to be used for Scarborough OPP:

Woodside are to provide information on greenhouse gas emissions for the project including;

- A quantified inventory of all GHG emissions arising from the project including;
 - direct emissions - NGER Act Scope 1; and
 - indirect emissions - NGER Act Scope 2 and 3 emissions and related emissions from the Scarborough project at facilities other than those that form part of the Scarborough OPP, but over which Woodside has partial or complete operational control.
- For direct emissions;
 - describe and evaluate the extent of potential impacts and risks to the local airshed related to the Scarborough upstream operations.
 - provide a full description and evaluation of management measures available, including alternatives analysis, to reduce potential impacts and risks to the local airshed and reduce GHG emissions over the life of the project to acceptable levels.
 - provide environmental performance outcomes for the ongoing management of impacts and risks of direct GHG emissions to the local airshed for the life of the project.
- For all GHG emissions;
 - Describe the contribution of total direct and indirect emissions for the life of the project including the contribution of these emissions to national and international GHG emissions and climate change.

- Describe how total GHG emissions over the life of the project are to be managed in accordance with national and international mechanisms that account for and seek to reduce these impacts to acceptable levels.
- Provide environmental performance outcomes that provide for ongoing alignment with national and international mechanisms for the management of GHG emissions for the life of the project.

[REDACTED]

National Offshore Petroleum Safety and Environmental Management Authority

T: [REDACTED] | M: [REDACTED] | E: [REDACTED] | W: nopsema.gov.au

Regulating for safe and environmentally responsible offshore energy industries.
To receive the latest news and information [subscribe here](#).



For Official Use Only

From: Cameron Grebe [REDACTED]

Sent: Tuesday, 12 March 2019 12:55 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Urgent: NOPSEMA follow up on communicating Greenhouse gas emissions treatment in assessment and decision making

Good afternoon James,

Thanks for your time to meet with Stuart Smith and me last week. We appreciate the opportunity to discuss the background to the expectations re greenhouse gases and how both indirect and indirect emissions are to be treated in assessment and decision making under environmental approval processes.

We are keen to work closely with you to clarify the details and look forward to jointly move forward on this issue across the range of petroleum resource projects in various stages of planning and approval processes.

In the interim, we have a decision due this Thursday on the Scarborough OPP for Woodside as part of the stage 1 (suitability for publication for public comment) assessment.

I realise the timeframe is short but to ensure a consistent approach is adopted in communicating content expectations in this area across both EPBC and OPGGS environmental approval documents, we felt it was important to get your agreement to the text the decision maker (NOPSEMA CEO) would communicate in NOPSEMA's decision to the proponent. As it is only a request for further information it is relatively high level and we would therefore seek your support for joint clarifications with the proponent so that further details can be discussed and alignment on expectations from both NOPSEMA and Department processes can be maintained.

Urgent request for response on draft text for Request for information decision:

It would be greatly appreciated if you please let us know by midday Thursday (your time) if you're comfortable with the text (below) or whether you require amendments to reflect your expectations for equivalent treatment in the Browse EIS when it reaches that stage? We have drafted text based on our understanding reached through discussions last week and the relevant decision documentation we have been provided, so I expect there may be clarification or edits required.

Many thanks for your assistance. Happy to discuss further by phone.

For info [REDACTED] is managing the assessment (and is NOPSEMA EPBC Program contact) and is copied along with the lead assessor ([REDACTED]) and policy contact ([REDACTED]). If you are able to request staff communicate responses to all NOPSEMA staff copied that will assist in timely progress of our decision making this end.

Proposed draft text for inclusion in the formal 'Request for Further Written Information' text to be used for Scarborough OPP:

- Woodside are to provide information on greenhouse gas emissions for the project including;*
- A quantified inventory of all GHG emissions arising from the project including;
 - o direct emissions - NGER Act Scope 1; and*
 - o indirect emissions - NGER Act Scope 2 and 3 emissions and related emissions from the Scarborough project at facilities other than those that form part of the Scarborough OPP but over which Woodside has partial or complete operational control.**
 - For direct emissions;
 - o describe and evaluate the extent of potential impacts and risks to the local airshed related to the Scarborough upstream operations.*
 - o provide a full description and evaluation of management measures available, including alternatives analysis, to reduce potential impacts and risks to the local airshed and reduce GHG emissions over the life of the project to acceptable levels.*
 - o provide environmental performance outcomes for the ongoing management of impacts and risks of direct GHG emissions to the local airshed for the life of the project.**
 - For all GHG emissions
 - o Describe the contribution of total direct and indirect emissions for the life of the project including the contribution of these emissions to national and international GHG emissions and climate change.*
 - o Describe how total GHG emissions over the life of the project are to be managed in accordance with national and international mechanisms that account for and seek to reduce these impacts to acceptable levels.*
 - o Provide environmental performance outcomes that provide for ongoing alignment with national and international mechanisms for the management of GHG emissions for the life of the project.**

Cameron Grebe
Head of Division - Environment
National Offshore Petroleum Safety & Environmental Management Authority

T: [REDACTED] | M: [REDACTED]
E: [REDACTED]