



**23 February 2023**

Woodside Energy  
Attention: Mia Yellagonga Karlak  
11 Mount Street,  
Perth, WA  
6000

By email: [Feedback@woodside.com.au](mailto:Feedback@woodside.com.au)

**RE: Woodside Consultation - Nganhurra Operations Cessation Environment Plan Revision**

We are responding to Woodside's consultation information sheet that the Maritime Union Australia (MUA) has received regarding decommissioning Nganhurra's RTM. The union appreciates Woodside's recognition of the union's relevancy on this issue. We welcome the opportunity to assist Woodside in planning for this project's safe and effective decommissioning while considering the least impact on the marine environment.

### **Our position on decommissioning**

The MUA agrees that all titleholders in ownership of aging infrastructure, including Woodside Energy, shall adhere to the base case outlined in section 572 of the Offshore Petroleum and Greenhouse Gas Storage Act 2006. Total removal of offshore oil and gas equipment and remediation of the disturbed seabed and environment shall always be the best practice.

Recycling oil and gas equipment will create thousands of employment opportunities for workers nationwide. The MUA is working closely with the government and independent agencies, including The Centre of Decommissioning Australia (CODA), to ensure local disposal yards are established, the safety of workers is respected, good environmental outcomes are adhered to, and Australia is ready for the scale of decommissioning work to come.

### **Woodside's Enfield project**

After witnessing the disastrous events that came from the Northern Endeavour decommissioning project, the MUA is disappointed that Woodside has only begun to

consider options for removal of the Nganhurra's RTM after it was directed by NOPSEMA to do so. Certain issues must be addressed for this project prior to an environmental plan being lodged to NOPSEMA.

### Cyclone Season

With over 35 years' experience in WA's offshore oil and gas sector, it is surprising to us that Woodside has chosen to wait until December to remove the RTM. This is peak cyclone season (which occurs every year from November to April). The union is concerned that Woodside's attempts to recover a piece of equipment weighing 2,500 ton during cyclone season will only delay the project and decrease the chances of a full recovery of the RTM.

Moving the project forward to a month prior to cyclone season will reduce ALARP levels of the project's activities to a satisfactory level and reduce the risk of harm to both the workforce and the environment. Further consideration must be given on recovering the RTM at this time.

### Woodside's responsibility

Under the OPGGS Act, Woodside is required to decommission and remove all disused project infrastructure, but instead has chosen to leave the Nganhurra's RTM degrading, with little maintenance complete since its disconnection in 2018.

After all this time, we are pleased to see that Woodside's primary proposal is complete removal of the RTM and every effort must be made to ensure this course of action is completed. However, we are concerned to see two alternate options of sinking the RTM as part of the proposed Nganhurra Operations Cessation Environment Plan. These options must not be included in this document.

Any problems faced by Woodside to remove the RTM is due to the company's own carelessness in maintaining its equipment, which remained disused, and not removed within a suitable time frame. It is the duty of the title holder to remain compliant after production ceases, and failing to do so should not result in inexcusable back up plans including substandard dumping of the RTM on the seabed.

Decommissioning and removal of Woodside's RTM must always take precedence. No back up options should be considered in the environmental plan until attempts to remove the structure have failed. Including alternate options of dumping the RTM into the environment plan does not reflect that Woodside recognises the importance of adhering to issued directions.

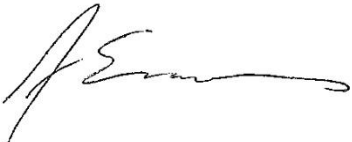
The union will not accept Woodside's inept behaviour for cleaning up after itself. It is time that Woodside takes decommissioning of its aging assets seriously. The proposed environmental plan must move forward with the primary option of full removal of the RTM, and back up options of dumping must be scrapped.

We will continue to argue to the regulator that Woodside's resistance to complying with

decommissioning and removal obligations is making a mockery of the current policies and regulations.

Please feel free to contact our Research Officer, Penny Howard for further information, at [penny.howard@mua.org.au](mailto:penny.howard@mua.org.au)

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'A Evans', with a long horizontal flourish extending to the right.

Adrian Evans  
**Assistant National Secretary**  
**Maritime Union of Australia Division**  
**Construction, Forestry, Maritime, Mining and Energy Union**