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**The Chairman
Environment and Communications References Committee
The Senate**

Sent by email: ec.sen@aph.gov.au

23 January 2017

INQUIRY INTO THE PROTECTION OF ABORIGINAL ROCK ART OF THE BURRUP PENINSULA

I refer to your correspondence of 2 December 2016, inviting Woodside to make a submission to the Senate Environment and Communications References Committee Inquiry into the Protection of Aboriginal Rock Art of the Burrup Peninsula (Murujuga). Woodside welcomes the opportunity to make this submission to the Committee's inquiry.

Woodside, through its operations at the North West Shelf Venture's Karratha Gas Plant and Pluto Joint Venture's Pluto LNG, has operated Liquefied Natural Gas (LNG) facilities on Murujuga for over 30 years. Woodside is proud of its relationships with traditional owners and custodians built over that time.

Since 2007, the values of the rock art of Murujuga have been further recognised through the inclusion of the Dampier Archipelago (including Burrup Peninsula) on the National Heritage List. Since that time, Woodside has demonstrated its ability to co-exist with the national heritage values and support the recognition of those values through community based projects.

We appreciate the manner in which our relationships support our ongoing heritage management activities and obligations. Woodside's obligations include those that are set out in our *Conservation Agreement (Agreement)*, which was signed with the Commonwealth Government on 3 July 2007, to satisfy relevant requirements of the *Environmental Protection and Biodiversity Conservation Act 1999 (Cth)*. Woodside's approach delivers on both the purposes of the Agreement and at the same time ensures support for local community aspirations to deliver both tangible and intangible values.

Woodside recognises that our collaborative relationships with traditional owners, governments and community stakeholders are essential in our ability to effectively manage heritage. We also apply significant effort to monitor and manage our environmental impacts, consistent with industry standard air emissions management practices, our internal management system, regulations and environmental licence requirements.

Woodside received Western Australian Ministerial Approval of the Pluto LNG Development in December 2007. Through the Pluto LNG Development environmental approvals processes, a requirement for Woodside to develop an Air Quality Management Plan (AQMP) was established. The AQMP was approved by the Office of the Environmental Protection Authority (OEPA) during October 2011 and includes monitoring and review programs for ambient air monitoring and nitrogen depositional monitoring.

During 2013 and 2014, ambient monitoring was also undertaken by specialist consultants in line with relevant monitoring and analysis standards. An independent review process was also undertaken, using an independent peer reviewer and review methodology endorsed by the OEPA. The ambient monitoring program confirmed that nitrogen dioxide levels were well below Australian standard levels and were also below international environmental standards. The independent review also confirmed that the Pluto LNG

Development assessment of risk based on estimated or predicted emissions of nitrogen dioxide and ozone should be “low” as assessed on the assessment framework, previously adopted by the Department of Environmental Regulation (DER) (formerly Department of Environment and Conversation (DEC)).

The collective results and independent review of Woodside’s Nitrogen Deposition Program confirmed that there has been no significant change to the total nitrogen deposition rate following commissioning of the Pluto LNG Development.

In addition to its heritage management activities and recognition of the national heritage values, Woodside also supports appropriate scientific monitoring of air emissions. Woodside has been undertaking or contributing to air monitoring studies of the Burrup since 2008. Woodside’s approach to monitoring and air emissions management practices has also been informed by third-party studies including the work undertaken by the Burrup Rock Art Monitoring Management Committee (BRAMMC) which was established in 2002.

In 2009, upon recommendation to the Minister for State Development, BRAMMC was replaced with a technical working group to oversee the continuation of the Burrup rock art monitoring program. On 20 September 2010, the Burrup Rock Art Technical Working Group (BRATWG) was established and until 30 June 2016, undertook reviews of the data collected from the annual monitoring program [conducted by CSIRO] and made recommendations to the Minister for Environment and the DER. Woodside was an active member of BRATWG, as the identified ‘Burrup industries representative’ and refers the Committee to the work of this group, including its *‘Five year review’* report issued on 11 May 2016 to the Western Australian Minister for Environment. Woodside would support BRATWG’s work continuing should the State consider that to be appropriate.

Woodside continues to apply a range of air emissions management practices at our Burrup facilities, consistent with industry standard air emissions management practices, our internal management system and regulations and environmental licence requirements. These include, but are not limited to, combustion equipment control and optimisation, routine maintenance and inspection, efficiency optimisation and emissions tuning, fuel and flare monitoring and reporting, stack emissions testing, smoke monitoring and regular reporting to the Department of Environmental Regulation and energy efficiency opportunity reviews.

Woodside sees value in the Committee’s consideration of the matters raised within. I trust that this submission will be of assistance in the course of your inquiry.

Yours Sincerely,

Mike Utsler
Chief Operations Officer