

Table 2: Summary of key potential impacts and risks and key proposed control measures for wellhead removal activities.

aspect	key impacts/risks	key proposed control measures ¹		
Note: other aspects identified in this table below (e.g. seabed disturbance) could have potential impacts or pose risks to cultural heritage, with the proposed control measures listed here also applicable.	 Potential impacts to underwater cultural heritage (UCH) sites and/or materials (tangible). Potential impacts to cultural values (intangible), including songlines, dreaming stories and culturally important marine fauna. 	 Offshore marine personnel will undertake an induction, including cultural heritage information and procedures. ROV operators will undertake an induction, to assist in identification of potential UCH. ROV visual surveys and inspections of the seabed at the wellhead will be undertaken before and after removal activities. In accordance with the Chevron Australia Inadvertent Aboriginal Underwater Cultural Heritage Discovery Procedure, if any suspected UCH material is found, work is stopped, relevant parties notified, and appropriate management actions implemented. Control measures related to marine fauna and other cultural values and features are outlined in sections below. 		
planned activities				
Physical presence of subsea infrastructure and vessels within the OA	Physical presence of wellhead stub following wellhead removal and vessels within the OA may interact with commercial shipping, fishing vessels and marine fauna.	 Relevant parties will be advised of the commencement of key phases of the activity. Marine safety information to be issued via AUSCOAST and/or Notice to Mariners (where required) prior to commencing the activity. Vessels will meet the crew competency, navigation equipment, and radar requirements as per the Chevron Corporation Marine Standard. In accordance with EPBC Regulations 2000 – Part 8 Division 8.1 – Interacting with Cetaceans, vessels will implement caution and no approach zones, where practicable. Fauna interaction record keeping requirements communicated to relevant personnel, including vessel master and crew conducting bridge watch, prior to commencing activities. Where required, a simultaneous operation plan will be developed and implemented to manage the activity. 		
Seabed disturbance	Seabed disturbance from wellhead removal and recovery may result in the alteration of marine habitat and a localised and temporary change in water quality.	Activity-specific work procedures developed and implemented. ROV visual surveys and inspections of the seabed at the wellhead will be undertaken before and after removal activities to record the condition of the seabed. Vessels will meet the crew competency, navigation equipment, and radar requirements in accordance with the Chevron Corporation Marine Standard.		
Underwater sound from use of ROV and wellhead infrastructure removal tooling, vessel and helicopter operations	Offshore activities within the OA may result in a localised and temporary change to ambient underwater sound.	In accordance with EPBC Regulations 2000 – Part 8 Division 8.1 – Interacting with Cetaceans, vessels will implement caution and no approach zones, where practicable.		

¹ Proposed control measures are subject to change through consultation with relevant persons and the subsequent NOPSEMA assessment process.

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	A change in ambient underwater sound may result in behavioural disturbance or auditory impairment to marine fauna.	 Vessel bridge-watch crew will undertake marine fauna observations. Pre-start visual observations will be undertaken prior to the commencement of wellhead removal activities.
Light emissions	 Navigation and operational lighting from vessels within the OA may result in a localised change in ambient light. Change in ambient light may result in the temporary attraction or deterrence of light-sensitive species. 	Vessels will meet lighting requirements of the Chevron Corporation Marine Standard. Vessels working at night will be required to reduce external lighting to the minimum required for safe operations and navigation, and where practicable, operational lighting directed downwards to deck working areas.
Atmospheric emissions	Combustion of fuel from vessels and helicopters operations may result in a localised and temporary reduction in air quality. Greenhouse gas (GHG) emissions within the OA may result in contribution to the reduction of the global atmospheric carbon budget.	 Reduced sulphur content fuel will be used. Vessels will comply with the requirements of Marine Order 97 (MARPOL 73/78 Annex VI) in relation to air pollution. Compliance with GHG emissions reduction targets outlined in any applicable in-force legislation of approval conditions (currently the approved Gorgon Greenhouse Gas Management Plan and Federal Government's Safeguard Mechanism).
Discharges from vessel operations	Planned discharges from vessel operations (e.g. sewage and food waste) may result in a localised and temporary change in water and/ or sediment quality, and subsequent impacts to marine life.	 Vessels will comply with the requirements of Marine Order 96 (MARPOL 73/78 Annex IV) in relation to sewage discharge. Vessels will comply with the requirements of Marine Order 95 (MARPOL 73/78 Annex V) in relation to food waste discharge. Vessels will comply with the requirements of Marine Order 91 (MARPOL 73/78 Annex I) in relation to oily bilge water discharges.
Discharges from wellhead removal operations	Planned discharges from wellhead removal operations (e.g. metal swarf, grit, flocculant) may result in a localised and temporary change in water and/ or sediment quality, and subsequent impacts to marine life.	Hazardous materials will be selected and managed in accordance with the Chevron Australia Hazardous Materials Management Procedure. Activity-specific work procedures developed and implemented.
unplanned events (accidents/i	ncidents)	
Invasive marine pests	Planned discharge of ballast water or the presence of biofouling on vessels may result in the introduction of an invasive marine pest.	 Vessels will meet the requirements of the Chevron Australia Quarantine Management Procedure for Marine Vessels. Ballast water exchanges will be managed in accordance with the Australian Ballast Water Management Requirements. Vessels greater than 400 gross tonnes with an antifoul coating are to maintain an up-to-date international antifouling coating certification in accordance with the Protection of the Sea (Harmful Anti-fouling Systems) Act 2006 and/or relevant codes and standards. Where required, vessel pre-arrival information will be reported through the Maritime Arrivals Reporting System as per the Commonwealth Biosecurity Act 2015.

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Seabed disturbance	Seabed disturbance from vessel and ROV activities (e.g. a dropped object) may result in the alteration of marine habitat and a localised and temporary change in water quality.	Activity-specific work procedures developed and implemented. Vessels will meet the requirements of the Chevron Australia Control of Work process, including safe lifting procedures.		
Unplanned release during handling / storage of hazardous materials or wastes	A release of hazardous material or waste (e.g. fuel, sewage) may result in change to water quality, marine pollution and subsequent impacts to marine fauna, potentially resulting in injury or mortality.	 Hazardous materials stored and handled appropriately, including secondary containment, where required. Vessels will meet the requirements of the Chevron Corporation Marine Standard, including the premobilisation inspections of equipment, couplings and secondary containment. Vessels will comply with the requirements of Marine Order 91 (MARPOL 73/78 Annex I) in relation to having an approved Ship Oil Pollution Emergency Plan in place. Vessels will comply with the requirements of Marine Order 95 (MARPOL 73/78 Annex V) in relation to managing waste (garbage) offshore. 		
Unplanned release from vessel collision	A release of hydrocarbons (e.g fuel) may result in marine pollution, change to water quality, smothering of subtidal and intertidal habitats and subsequent impacts to marine life, indirect impacts to fisheries, and reduction in amenity.	Vessels will meet the crew competency, navigation equipment, and radar requirements of the Chevron Corporation Marine Standard. Marine safety information to be issued via AUSCOAST and/or Notice to Mariners (where required) prior to commencing the activity. Spill response Vessels will comply with the requirements of Marine Order 91 (MARPOL 73/78 Annex I) in relation to having an approved Ship Oil Pollution Emergency Plan in place. Emergency response will be implemented in accordance with the arrangements and strategies detailed in the Chevron Australia Oil Pollution Emergency Plan (OPEP). Where required, operational and scientific monitoring will be undertaken in line with the Chevron Australia Operational and Scientific Monitoring Plan (OSMP).		
emergency response				
Physical presence – oiled wildlife response	In the event of an oil spill which impacts fauna, implementing wildlife response may require personnel to interact with fauna.	 Where required, operational and scientific monitoring will be undertaken in accordance with the Chevron Australia OSMP. Emergency response will be implemented in accordance with the arrangements and strategies detailed in the Chevron Australia OPEP. 		