

Please direct all responses/queries to:
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NPI Review Team
Department of Environment and Energy
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Dear Sir or Madam

REVIEW OF THE NATIONAL POLLUTANT INVENTORY – RESPONSE TO DISCUSSION PAPER

Woodside Energy Ltd ('Woodside') has reported to the National Pollutant Inventory ('NPI') since 1998 and currently reports environmental data to the NPI for 10 facilities. Woodside welcomes the opportunity to provide this submission in response to the NPI Review Discussion Paper and looks forward to participating in further consultation. Woodside has also contributed to the submissions made by the Chamber of Minerals and Energy (WA), and the Australian Industry Greenhouse Network. This supplementary submission draws upon Woodside's twenty-year experience of reporting to the NPI.

Executive Summary

Woodside continues to support the collection and publication of NPI data. The NPI database provides an important historical record of pollutants in the environment and should maintain the core environmental outcomes that the NPI National Environment Protection Measure ('NPI NEPM') framework aims to achieve. There is scope for improvement within the NEPM framework, including:

- Facilitating information sharing between government agencies to streamline reporting processes;
- Improving the way that data is presented to encourage increased usage; and
- Providing insights from submitted data to industry reporters to better understand trends in the environment.

Response to selected discussion paper questions on Environmental outcomes

Do the NPI NEPM outcomes remain relevant? If not, how may they be changed?

Woodside believes that the desired outcomes of the NPI to "maintain and improve air and water quality, minimise the environmental impacts associated with hazardous wastes, and improve the sustainable use of resources" remain relevant. The NPI provides a valuable historical record of environmental impacts occurring in Australia and the environmental performance of our major industries.

However, Woodside believes that the reporting framework could be better structured to assist the achievement of the outcomes. For example, the information collected could be leveraged in a manner that is more insightful to business. This could include:

- Improved benchmarking against peer facilities;
- Ability for reporters to contribute voluntary contextualised insights into the public report;
- Providing trends across industry and/or Australian and New Zealand Standard Industrial Classification ('ANZSIC') codes to improve both industry and public insights.

How can the NPI data be more useful to you, your organisation or your industry?

Woodside does not currently use the NPI as a formal means of communicating environmental performance to stakeholders. Woodside publishes an annual Sustainable Development report and maintains an environment

website section^{1,2}. The addition of contextual information to the NPI database, as well as the ability to aggregate data to a company level would increase the usability of the database in public reporting.

How can the data... be more useful for tracking environmental progress?

Discerning clear trends from the dataset across industries is difficult. Reinstating and improving the National Pollutant Inventory Summary Report would improve public and industry insights from the data set and therefore assist in achieving the desired environmental outcomes. Additionally, improving the visualisation and analytics on the NPI user interface would encourage increased engagement from both the public and industry.

Response to selected discussion paper questions on Performance

Are there any substances you would like to see on the NPI substance list? Or removed?

Woodside supports consideration of reducing the substance list, prioritising those substances with the greatest potential to impact communities and the environment, while aligning with other international programs. Woodside strongly discourages frequent modification of the substance list as this would reduce policy certainty for reporters and limit year on year comparison of reported figures.

Do you think a TAP should be formed to re-examine the substance list?

In Woodside's opinion there is sufficient basis to form a Technical Advisory Panel (TAP) to investigate changes to reporting requirements, including sector inclusion codes and reporting thresholds. Recommendations to the panel include:

- That the panel investigate the option of reporting against source specific thresholds (as opposed to substance specific thresholds), similar to the National Greenhouse and Energy Reporting (NGER) scheme, the provision of which could reduce data collection while still reporting a meaningful dataset. This may include considerations for excluding Emissions Estimation Technique Manuals (EETMs) or specific sources for facilities by sector, for example, not requiring oil and gas processing facilities to report on sources only covered in the Mining EETM.
- Aligning general reporting principles with the NGER scheme. Woodside believes that consideration should be given to aligning reporting requirements regarding operational control and reporting thresholds to the facility-level thresholds used under NGER, noting that NPI is a spatial dataset requiring facility-level information.

What opportunities are there for the NPI to improve the user experience for the public, industry and government?

Streamlining EETMs would assist reporters to better understand their reporting requirements. As individual facilities rely on using numerous manuals, often unrelated to the reporter's core industry, a database of factors coupled with improved manuals would significantly improve accuracy across industry and ease of construction. This could include delineating manuals by ANZSIC code or facility type (or other classification) and would include recommended sources which are expected to be reported by certain types of facilities. This would reduce the reporting of sources which are immaterial to certain industries, such as exposed land dust calculations, which are material to mining stockpiles but are not material to oil and gas processing inventories.

The NPI website and Online Reporting System (ORS) are now dated and users would greatly benefit from improved functionality (particularly the ORS) and more graphical representation of published data. Woodside would recommend:

- Improvement of the validation check process. Validation requirements to respond to differences of activity in emission sources and to comments across multiple substances resulting from the same activity are onerous.
- Improvement of the report submission process. During submission when certain thresholds have been tripped, the system does not provide the ability to report blanks and adds substances back in after deletion. Woodside acknowledges the requirement that emission values of zero are not able to be reported however blank emission figures should be accepted.

¹ <http://www.woodside.com.au/Working-Sustainably/Pages/Sustainable-Development-Report.aspx>

² <http://www.woodside.com.au/Working-Sustainably/HSEQ/Pages/Environment.aspx#.W2hpFlozY2w>

Are there any opportunities to reduce duplication of effort in data collection?

Woodside believes removing duplication of reporting between relevant government agencies could significantly streamline processes. Woodside is currently required to duplicate federal and state reporting for NPI, NGER and licence fee calculations for onshore gas plants. Improved information sharing between the Western Australian (WA) Department of Water and Environmental Regulation (DWER) and the WA Department of Mines, Industry Regulation and Safety (DMIRS), for example, could facilitate this.

Is transfer data providing sufficient value for stakeholders?

Woodside believes that the reported transfer data has limited value for stakeholders. Transfer data is often based on estimated quantities and default compositions. Woodside therefore recommends that the mandatory reporting of waste transfers be discontinued.

How could your overall user experience be improved?

Woodside considers that providing the option to use default factors, as well as the option of using site-specific data, is necessary to limit the significant resource (financial and personnel) required to construct inventories. Woodside believes that maintaining these provisions strikes a balance between accurate reports and managing the reporting burden of inventory construction.

Woodside would not support releasing yet-to-be validated data to the public but would rather suggest encouraging reporters to report once, using the best available information. Requiring yet-to-be validated data to be reported would also increase the burden on agencies due to reporters requesting updates as new data becomes available.

Response to selected discussion paper questions on Resourcing

Should NPI facility reported and/or NPI data users be asked to contribute... through a cost recovery model?

A user pays model does not encourage increased database access. Moreover, a reporter-pays model would unfairly burden industry as the NPI annual construction is already financially expensive and personnel intensive, particularly for reporters with complex inventories.

Thank you for the opportunity to contribute to this consultation and look forward to contributing further to support improvements in the NPI.

Yours faithfully,



Jarrod Pittson
General Manager - Environment