Palawa Submission on Woodside Energy Bass Strait SWWEP Drilling and Subsea Installation 'Environment Plan'

November 2026

Aboriginal Land Council Tasmania

Tasmanian Aboriginal Centre

Submission on behalf of the Palawa people of Lutruwita / Tasmania to the

SWWEP (Sweetlips, Wirrah, Whiting and East Pilchard) Drilling and Subsea Installation Environment Plan of Woodside Energy and Esso

Production Licences VIC/L2, VIC/L9, VIC/L10 and VIC/L25, Gippsland Basin

To: Woodside Energy – feedback@woodside.com / IndigenousAffairs@woodside.com
Copy: National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) Date: November 2026

This submission has been provided by the Tasmanian Aboriginal Centre, the Aboriginal Land Council of Tasmania, the Pakana Rangers and the Truwana Rangers on behalf of the Palawa people of Lutruwita / Tasmania.

1. About the Tasmanian Aboriginal Centre

The Tasmanian Aboriginal Centre (TAC) represents the Palawa People, the Aboriginal people of Lutruwita/Tasmania.

We are an Aboriginal community-controlled organisation established in the 1970s. We represent Palawa political and community development aspirations. We fight for the recognition of our people's rights and deliver a wide range of programs, including a Healthy Country program.

This program enables Palawa people to connect with and enjoy Country, keep cultural practices alive and are working to establish the first Sea Country Indigenous Protected Area (IPA) in Lutruwita. Through our work to establish the Tayaritja Wukalina milaythina muka (Sea Country IPA) around the Furneaux Islands, we are working to finalise a management plan to guide our work and deliver marine conservation management projects in partnership with others.

About the Aboriginal Land Council of Tasmania

ALCT is a statutory body that was established under the *Aboriginal Lands Act 1995*, after decades of Aboriginal campaigning for land justice. The Act returned lands of cultural and historical significance to Palawa people, a step towards restoring what was taken through dispossession.

ALCT holds this land in trust for current and future generations of Aboriginal people. We care for Country, protect cultural heritage, and manage land and natural resources according to Aboriginal values and authority.

ALCT is governed by eight Aboriginal Councillors, elected by the Community in elections run by the Tasmanian Electoral Commission. This gives Councillors a direct democratic mandate to represent Palawa people on matters affecting land, water, heritage and culture.

The Pakana Rangers

Aboriginal land and sea rangers operating through the Tasmanian Aboriginal Centre (TAC) to care for Country across Lutruwita / Tasmania and the Bass Strait islands. Their work blends traditional Aboriginal knowledge, cultural practices, and scientific research to restore ecosystems and protect cultural heritage

The Truwana Rangers

Aboriginal ranger team based on Truwana / Cape Barren Island in Tasmania's Tayaritja / Furneaux Islands, operating under the Aboriginal Land Council of Tasmania. Formed around 2015–2016 after the island was returned to Aboriginal ownership in 2005, they combine Traditional Knowledge and Western science to care for land, sea, and cultural heritage.

2. Summary of our position

Palawa people oppose the SWWEP proposal and asks that the Environment Plan not be accepted. Our reasons are:

- The area that could be affected by a spill (the EMBA) includes Tayaritja and the proposed Tayaritja Wukalina milaythina muka Indigenous Protected Area (IPA).
- Palawa people have not given their Free, Prior and Informed Consent (FPIC), as set out in the United Nations Declaration the Rights of Indigenous Peoples, which Australia endorsed in 2009.
- The proposal opens four new, previously undeveloped gas reservoirs. This goes against the scientific and international consensus that new fossil fuel reserves must stay in the ground.
- The International Energy Agency's Net Zero by 2050 pathway leaves no room for new long-lead-time oil and gas developments.
- The Environment Plan leaves out the greenhouse gas emissions from burning the product, which far outweigh anything the plan assesses.
- The EMBA includes habitat for endangered blue whales and other protected marine life.

3. Assertion of Sovereignty

Palawa (Tasmanian Aboriginal people) have not ceded sovereignty. We have not ceded our rights to Lutruwita/Tasmania lands, waterways, seas and sky Country.

Country is the English word we use to describe the lands, waterways, seas and sky that we are a part of. Country is more than a description of our connection to lands, waterways, seas and sky. Country is us and we are Country. Country is intrinsic to our culture and tunapri/knowledge. We understand that we are a part of Country, not separate to it.

We have an unbroken obligation to care for it, as we do for family. Country holds lore, custom and language, and is at the center of our spiritual and cultural practices providing sustenance for our people as it has for millennia. Country is a living being that has its' own right to exist and thrive.

Palawa have a unique, ongoing, unbroken and reciprocal relationship with Country. We have responsibilities to care for and look after Country.

Part of our relationship to Country is that we are interconnected with all elements of Country within a reciprocal relationship. "Healthy Country Healthy People" is real for us, and it goes both ways too – healthy people leads to healthy Country.

Our relationship with Country is at the heart of all we do. It is the legacy we carry from all the generations who came before us, it guides our values, our principles and our rights, and it brings with it the responsibility to care for Country in stewardship for future generations.

Country also provides us with a sense of who we are as individuals, families and as a Community. It's a place of sustenance, healing and regeneration, and it helps anchor us back to what is important.

It is Country that created us and our belonging to Country gives us our responsibility and our ownership. Through our history, our struggles and our enduring connection we have not ceded sovereignty or our rights our Country.

We ask that all people that live, work and visit our Country or wish to undertake activities that may impact our Country learn to respect our people's rights to our Country. From our relationship with Country, we assert the rights to maintain our ongoing connections to Country, and all that this connection brings to us. These rights being:

- The right to self-determination in choosing how we as a Community advance in all matters related to our Country.
- The right to shared decision-making with others on issues that impact on our Country, and especially where these decisions impact on our Community.
- The right to economic benefits derived from our Country.

Our people have cared for and depended on Land and Sea Country across Bass Strait, including Tayaritja / the Furneaux Islands, for tens of thousands of years. That connection continues today through our cultural practice, our harvesting, our community on the islands and our responsibility to care for Land and Sea Country.

We are the rightful owners of this sovereign Land and Sea Country. We have not ceded their ownership, and it remains stolen from us.

The dedication of the proposed Tayaritja Wukalina milaythina muka IPA will not recognise our unceded rights to our Sea Country in this area. But it will enable us to play an important role in caring for this Country.

Our Pakana land and sea rangers are already actively running programs to care for Tayaritja Milaythina Muka and have the knowledge, experience and capability to play an increasing role in managing this area.

4. Recognition of our internationally recognised rights

When you come to our Country or want to do work about our Country, you must recognise that you are our guests. As guests on our Country, we expect you to respect

our rights. Doing this requires you to recognise that your perceived rights may be impacted. It means that not everything you may wish to do, record, study, or share is yours to do, record, study or share. This is not a new concept, but it is not widely understood or protected through Australian law.

As such, we recognise that we live in a colonial system that does not recognise our rights or the value of our knowledge, and the cultural systems we use to maintain our knowledge.

When you visit or work on our Country, do work about our Country or release information about our Country you must:

- Observe the United Nations Declaration on the Rights of Indigenous People (UNDRIP).
- Always ask for our free, prior and informed consent, and respect our right to self-determination.
- Do not assume rights, and do not come to us with a closed mind. We need you to question your entitlement and motivations, and act in a transparent manner with us.
- Apply the AIATSIS Code of Ethics to provide clarity on the principles inherent in ethical engagement with our people. e
- Respect and preserve our rights as custodians of Indigenous Cultural and Intellectual Property (ICIP) and recognise that our intellectual knowledge system is a collective ownership system.
- Where any information is provided in-confidence, that you recognise the legal responsibility you have not to share that information with other persons or parties.
- Always work with us in good faith and with a collaborative spirit.
- Always consider how you can help our community and apply the principle of do no harm.
- Accept that where you are seeking our knowledge, views or services that the cost of consulting our community, as required by our law will be borne by you unless we agree otherwise.
- Respect Indigenous Data Sovereignty through applying the internationally recognised CARE Principles.

5. Engagement requirement

Our organisations are considered a ‘relevant person’ under the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023*.

Our functions, interests and activities would be directly affected by this activity, by any unplanned release of oil or gas, and by the climate harm caused by burning the gas and condensate it would produce.

Palawa people have not given their Free, Prior and Informed Consent (FPIC), as set out in the UNDRIP, which Australia endorsed in 2009. In accord with these rights, we assert that engagement on projects of this nature, which clearly pose risks to our rights and interests must be undertaken in accord with the AIATSIS Code of Ethics.

6. The impact of the proposed project

Woodside is one of Australia's largest greenhouse gas emitters. Its 2025 emissions were nearly 100 million tonnes of CO2e.
https://www.woodside.com/sustainability/environment/climate

The majority of Woodside's emissions are 'scope three', however, the climate and the atmosphere do not recognise political national boundaries. Australia and Woodside are responsible for all Woodsides emission that result from the fossil fuels that it continues to extract and which are needlessly worsening the climate crisis.

7. Why the Environmental Management Plan must be rejected

New fossil fuel development is only "needed" if governments choose to keep fossil fuel use at today's levels, which isn't consistent with the global target of 1.5°C.

The southern gas gap is a short-term, peak-winter problem that is shrinking. Storage, batteries and electrification can address it, and it doesn't justify new reservoirs that could produce for decades.

The scientific case against new fossil fuel development is clear. The Intergovernmental Panel on Climate Change (IPCC) found in 2023 that emissions from existing and already-planned fossil fuel infrastructure would roughly use up the entire remaining carbon budget for 2°C. Existing infrastructure alone could push the world past 1.5°C. Oil Change International's October 2026 analysis goes further. It finds that fossil fuel projects already in operation would emit about seven times the remaining 1.5°C budget, and that existing gas fields alone would exceed it. Governments and courts have recognised this. At COP28, nations agreed to transition away from fossil fuels, and in 2025 the International Court of Justice treated 1.5°C as a binding legal limit. There is no room in any credible climate pathway for new reserves such as those Woodside proposes to open in Bass Strait.

No "need" for more, new fossil fuels

- **IEA's September 2025 decline-rates report:** The IEA says less investment is needed as demand falls. [iea.org], [jpt.spe.org] [opec.org], [energyanalytics.org] [iea.org]
- **AEMO's 2026 gas outlook:** gas from older southern fields is forecast to fall 46% in five years. AEMO says new supply, storage or pipeline investment is needed from around 2030. At the same time, it says total gas use is falling as homes and businesses electrify, and about 30 GW of batteries are cutting gas demand for power. Forecast shortfalls keep being pushed back. [aemo.com.au] [reneweconomy.com.au]

The science

- Peer-reviewed climate modelling from a 2024 study published in the journal *Science* by researchers from University College London and the International Institute for Sustainable Development (IISD) analysed scenarios from the Intergovernmental Panel on Climate Change (IPCC). The authors concluded that existing fossil fuel infrastructure is sufficient to meet global energy demand while transitioning to renewables, leaving no room for new oil, gas, or coal projects under a 1.5°C warming limit. [1, 2]
- International Energy Agency (IEA) findings. The IEA's Net Zero Emissions by 2050 roadmap states that no new long-lead-time oil and gas fields or new coal mines are needed on the path to net zero. Continued investment is only modelled for maintaining existing fields and already-approved projects as demand declines. [1, 2]
- Carbon budgets and offsets. Climate scientists and organizations such as The Australia Institute point out that the remaining global carbon budget is strictly limited. Approving new projects relies on the assumption that countries will either miss their climate targets or depend on unproven large-scale carbon capture and offsetting. [1, 2, 3]

Deliberate harm

There is no such thing as a harmless new fossil fuel project.

The IPCC has found that global warming rises in near-direct proportion to the total amount of carbon dioxide ever emitted, so every additional tonne adds to warming. It has also found, with very high confidence, that losses and damages escalate with every increment of warming.

Carbon dioxide stays in the atmosphere for centuries, which makes this harm effectively permanent.

Scientists estimate that only about 130 billion tonnes of CO_2 could be emitted from the start of 2025 for a 50% chance of limiting warming to 1.5°C, a budget that would be exhausted in little more than three years at current rates.

Burning the remaining reserves in the Kipper and Snapper fields would release at least 47 million tonnes of CO_2.

Peer-reviewed research suggests emissions on this scale could contribute to a significant number of fatalities worldwide this century.

The harm of climate change falls hardest on those who did least to cause it, including Aboriginal people whose Sea Country is already being transformed by warming waters, marine heatwaves and the loss of kelp forests. Every new fossil fuel project makes the climate crisis worse, and this one is no exception.

8. Consultation

Though we have taken part in this flawed consultation, the fact is that is has been conducted in breach of our rights and interests, recognised in the UNDRIP, which Australia has endorsed. It has not recognised our right to self-determination and FPIC, and has not been conducted in accord with the AIATSIS Code of Ethics.

On this basis, we do not give our consent to this proposal because it will materially contribute to the destruction of our Land and Sea Country.

In a similar vein, we note that the consultation documents feature Aboriginal-style graphics, including manta rays and turtles.

We consider these deeply offensive and do not believe that any Aboriginal nation or community, including those directly affected by this proposed development, support fossil fuel expansion and extraction.

The climate breakdown that Woodside continues to choose to needlessly worsen represents a severe threat to the existence of turtles and manta rays.

Woodside must not use Aboriginal graphics because they imply Aboriginal consent has been granted and they suggest harmony with Country and Community, when the opposite is the case.

9. The proposal

Woodside proposes to drill up to four new development wells (Sweetlips, Wirrah, Whiting and East Pilchard). It would install about 35km of subsea flowlines and about 32km of umbilicals and tie the wells into the Snapper and West Tuna platforms. Drilling would start around 2029 and installation around 2030. Woodside describes the targets as previously appraised, undeveloped gas reservoirs, which would produce gas and condensate for processing at Longford.

This is not maintenance of existing production. It is the development of new fossil fuel reserves that would otherwise stay in the ground. It also extends the life of the Bass Strait oil and gas system by many years.

Woodside says commissioning, startup and operations will be covered by separate Environment Plans. Splitting the project this way means the full impacts of the development, especially lifetime production and emissions, are never assessed together. We do not accept this approach.

10. What these licences contain

The new wells sit within four production licences that already hold large volumes of fossil fuel:

- **VIC/L2 (Wirrah, Whiting, part of West Barracouta):** Barracouta has produced gas and oil since the late 1960s. West Barracouta, a newer field connected through this licence, had about 7.9 billion cubic metres of gas remaining in 2021.
- **VIC/L10 (Sweetlips, Snapper):** Snapper had produced about 72.8 billion cubic metres of sales gas, 51 million barrels of condensate and 94 million barrels of natural gas liquids by 2021. It had about 5.8 billion cubic metres of recoverable gas remaining in 2022. Its main remaining reservoir originally held about 3.8 trillion cubic feet of gas in place.
- **VIC/L25 (Kipper) and VIC/L9 (East Pilchard, West Tuna):** Kipper holds about 620 billion cubic feet of recoverable gas and about 30 million barrels of condensate and LPG. About 12.9 billion cubic metres of gas remained in 2021. Less than 30% of Kipper's recoverable reserves had been produced by late 2024, and production is forecast to continue until about 2049.

The SWWEP wells would add to this already very large footprint.

11. Greenhouse gas emissions

Woodside's consultation material describes greenhouse gas emissions only as a "localised impact with no lasting effect". This is wrong. Greenhouse gas emissions are global, they build up in the atmosphere, and they are effectively permanent on human timescales.

Based on published reserve figures, we estimate that burning the gas and liquids remaining in these licences would release:

- about **35 million tonnes of CO_2** from Kipper (VIC/L25 and VIC/L9)
- about **12 million tonnes of CO_2** from the remaining Snapper gas (VIC/L10)

Snapper's production up to 2021 has already caused around 200 million tonnes of CO_2 once burned.

The facilities themselves are also major emitters. The Gippsland Basin facility reported about 1.63 million tonnes of CO_2-e in 2024–25. That was about 305,000 tonnes above its Safeguard Mechanism baseline, and the excess was covered by buying carbon credits rather than by cutting emissions. Emissions rose from the previous year.

Kipper gas has high CO_2 content, which requires CO_2 to be separated and vented at Longford. A carbon capture proposal described this stream as about 0.5 million tonnes per year. That proposal was withdrawn.

We assert that the Environment Plan must:

- assess the full lifecycle emissions, including scope 3 emissions, of all hydrocarbons the SWWEP wells would produce over their life
- explain how this production fits with Australia's legislated emissions targets and the Paris Agreement goal of 1.5°C
- not be accepted while these emissions remain unassessed.

Burning the remaining reserves in the Kipper and Snapper fields alone would release at least 47 Mt CO_2, excluding the new SWWEP reservoirs and operational emissions

This gap is the reason Woodside must assess lifetime scope 1–3 emissions for the SWWEP wells.

12. Fossil fuels must stay in the ground

The science is clear. To limit warming to 1.5°C, most known fossil fuel reserves must remain unburned, and no new reserves can be developed. Opening new reservoirs locks in decades of further emissions and further investment in fossil fuel infrastructure.

Climate change is already harming Sea Country. Warming waters, marine heatwaves, the loss of kelp forests and rising seas affect the species, places and cultural practices that Palawa people depend on. Approving new fossil fuel developments directly harms Country and our ability to care for it for future generations.

13. The International Energy Agency's Net Zero pathway

The International Energy Agency (IEA) is the world's leading energy authority, and Australia is a member. Its *Net Zero by 2050* roadmap (2021) and its 2023 update found that, in a pathway that keeps 1.5°C within reach, no new long-lead-time conventional oil and gas projects are approved for development.

The IEA's net zero pathway still allows no new long-lead-time oil and gas fields, and its own analysis shows less investment is needed as demand falls.

SWWEP is exactly the kind of new conventional development the IEA says is not compatible with net zero by 2050. Woodside's own material says the project still depends on "policy certainty" to reach a final investment decision. Governments and regulators should provide that certainty by declining to approve new fossil fuel developments.

14. The EMBA overlaps the proposed Tayaritja Wukalina milaythina muka IPA

Woodside's EMBA map shows that an unplanned release from this activity could reach Bass Strait, the north-east coast of Lutruwita/Tasmania and the Furneaux Group, with possible oil accumulation on shorelines in these areas.

This area overlaps the proposed Tayaritja Wukalina milaythina muka IPA. Our proposed Sea Country IPA covers Palawa Sea Country around Tayaritja and Wukalina. It is being established so that Palawa can protect, manage and care for these waters and their cultural and natural values.

Woodside describes the EMBA as covering "highly unlikely" events. The risk of a well blowout is still real. If it happened, the harm to the IPA, to cultural sites, to the shorelines and living places (i.e. middens) in Tayaritja and Wukalina and to the species our people harvest would be catastrophic. Woodside's own material acknowledges possible damage to archaeological and intangible cultural heritage.

We assert that:

- the Environment Plan specifically identify the proposed Tayaritja Wukalina milaythina muka IPA and assess the impacts and risks to it, and do so in a

manner that reflects our internationally recognised right to FPIC, as set out in UNDRIP, which Australia has endorsed.

- If the project is to proceed following such an assessment, that spill response planning (the OPEP) include specific measures for the Furneaux Group, developed with and controlled by Palawa
- this be done in addition to, not instead of, our request that the plan not be accepted.

15. Free, prior and informed consent

Article 32 of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), which Australia supports, says Indigenous peoples have the right to decide priorities for the use of their lands, territories and resources. It also says States must consult in good faith to obtain their free and informed consent before approving any project affecting those lands, territories or resources, particularly the exploitation of mineral, water or other resources.

FPIC means:

- **Free:** no pressure, manipulation or coercion
- **Prior:** consent sought well before any decision or activity, allowing time for our own decision-making processes
- **Informed:** full information about the nature, scale, duration, risks and impacts of the project
- **Consent:** the right to say yes or no, and to have that decision respected

The current process does not meet this standard. Woodside is consulting on a single Environment Plan, with a short timeframe, while startup and operations will be assessed separately. Information about lifetime production, emissions and cumulative impacts has not been provided. "Consultation" under the Environment Regulations is not consent.

This AIATSIS Code of Ethics applies to all Aboriginal and Torres Strait Islander research including research activities relating to environmental impacts on our Country. In the Australian context, research has generally been defined as ‘investigation undertaken to gain knowledge and understanding’ and casts a wide net in terms of what constitutes research.

This Code applies to academic research carried out in and by universities and publicly funded research agencies, governments and the private sector.

The principles and practices outlined in this Code also are applicable to activities that may not constitute research, but can impact upon, or be of importance to, Aboriginal and Torres Strait Islander peoples, such as actions which present risks to our rights and interests.

The AIATSIS Code of Ethics establishes that research that impacts or is of particular significance to Aboriginal and Torres Strait Islander peoples, including the planning, collection, analysis and dissemination of information or knowledge, in any format or medium, which is about or may affect Indigenous peoples, either collectively or individually. It also applies to all Aboriginal and Torres Strait Islander research, regardless of whether the research intends to directly involve human participants.

In accord with the Code, Aboriginal and Torres Strait Islander research should be understood as research that concerns or impacts Aboriginal and Torres Strait Islander peoples in any of the following ways:

- The research is about Aboriginal and Torres Strait Islander peoples, societies, culture and/or knowledge, Aboriginal and Torres Strait Islander policies or experience.
- The target population is Aboriginal and Torres Strait Islander individuals, groups, communities or societies.
- The target population is not explicitly Aboriginal and Torres Strait Islander individuals or communities but the research population includes a significant number of Aboriginal and Torres Strait Islander people.
- Aboriginal and/or Torres Strait Islander people have been incidentally recruited and researchers wish to do separate analysis of Indigenous-specific data.
- There are Aboriginal and Torres Strait Islander individuals or communities contributing to the research.
- There is new or pre-existing data related to Aboriginal and Torres Strait Islander peoples being used in the research.
- The research concerns Aboriginal and Torres Strait Islander peoples' lands or waters

The Code's principles should apply to this consultation. As it has not been applied to this consultation, we assert that it cannot be endorsed.

Woodside's commitments

Woodside's Indigenous Communities Policy commits it to being guided by the UNDRIP and to engaging with affected Indigenous communities in ways consistent with the principles of Free, Prior and Informed Consent.

Its Indigenous People's Strategy commits it to shared decision-making and to supporting Indigenous self-determination.

The SWWEP consultation does not meet these standards.

Palawa people have not been given the information needed for informed consent, including forecast production, the life of the project, lifetime emissions, worst-case spill volumes and the likelihood of oil reaching Tayaritja.

Commissioning and operations have been split into separate plans, so the full project has never been put before us or the wider public.

We do not consent to this proposal.

We ask Woodside to state publicly whether it will proceed without the consent of Palawa people and, if so, how that is consistent with its own policy and strategy.

16. Blue whales and other protected species

The EMBA includes waters recognised as important habitat for endangered blue whales. The South-eastern Australian and Tasmanian Shelf Waters Important Marine Mammal Area covers Bass Strait and Tasmanian coastal waters. It recognises pygmy and Antarctic blue whales, southern right whales, humpback whales and fur seals, among others. These species are part of Palawa culture and Country.

Underwater noise from drilling and vessels, vessel strike and any spill pose risks to these animals. Woodside proposes only compliance with standard cetacean regulations and observations "as required". We ask that the plan assess impacts on blue whales and other listed species across the full EMBA, and the cumulative effects of other pressures in Bass Strait.

The spill footprint (EMBA) likely covers several kinds of protected matters, including Matters of National Environmental Significance (MNES): Ramsar wetlands, threatened and migratory species, threatened ecological communities, the Commonwealth marine area and Australian Marine Parks.

Woodside's consultation sheet names none of these and only refers to "protected species" in general terms. Reference.

Wetlands of international importance (Ramsar)

Site	Why it matters
Corner Inlet (Victoria)	Victoria's only extensive broad-leafed seagrass beds and the world's most southerly white mangroves. More than 30 species of migratory waterbirds, and about half of Victoria's overwintering

Site	Why it matters
	migratory waders. Also supports the hooded plover, Australian grayling and orange-bellied parrot [dcceew.gov.au], [wgcma.vic.gov.au]
Logan Lagoon and **East Coast Cape Barren Island Lagoons** (Tayaritja)	Ramsar sites in the Furneaux Group

Threatened and migratory species

Whales and seals

- **Pygmy blue whale:** Beagle Marine Park, inside the EMBA, provides important feeding grounds for pygmy blue whales.
- **Southern right whale** (Endangered)
- **Australian fur seal:** listed marine species.

Sharks

- **White shark** (Vulnerable, migratory): recorded in Beagle Marine Park.

Seabirds

- **Short-tailed shearwater** (yula, muttonbird; migratory): breeds in the Furneaux Group, with about 2.86 million burrows on Babel Island alone. Palawa people have harvested yula for about 8,000 years, and it remains culturally and economically central for the Community. It is one of the world's oldest cultural practices.
- **Seabird islands in Franklin Sound:** an Important Bird Area supporting white-faced storm-petrels, little penguins and a large shearwater colony.

Shorebirds

- **Hooded plover:** recorded on Flinders Island and at Corner Inlet.
- **Orange-bellied parrot** (Critically Endangered): uses Corner Inlet saltmarsh and migrates across Bass Strait.
- **Eastern curlew** (Critically Endangered) and other migratory waders: present at Corner Inlet.

Threatened ecological communities

- **Giant kelp marine forests of south-east Australia** (Endangered)
- **Subtropical and temperate coastal saltmarsh** (Vulnerable).

Commonwealth marine area and Australian Marine Parks

- **The Commonwealth marine area** is an MNES in its own right, and the SWWEP wells sit in it.
- **Beagle Marine Park:** contains rocky reefs and sponge gardens. Parks Australia notes it was once part of the land bridge to Lutruwita / Tasmania, and that the islands remain culturally significant to Aboriginal communities.

Other protected matters

- **Underwater cultural heritage:** shipwrecks such as those in Beagle Marine Park are protected under separate legislation. Submerged landscapes of the former landbridge may also be relevant.
- **Tasmanian reserves:** Kent Group National Park and Marine Reserve, and Aboriginal-held land in the Furneaux Group, including islands handed back in 1995 where muttonbirding takes place.

The Environment Plan is expected to address these matters, because offshore petroleum is assessed by NOPSEMA rather than through a separate EPBC referral. We ask Woodside to:

- **List the matters:** identify every MNES within the EMBA.
- **Model the spill risk:** to say how likely oil is to reach Corner Inlet, the Furneaux Ramsar lagoons and the yula rookeries, and how quickly.
- **Protect the yula:** explain how breeding colonies would be protected during the breeding season.

17. Cumulative impacts on Bass Strait

Bass Strait is already heavily industrialised. It contains decades of oil and gas platforms and pipelines, shipping lanes, the Basslink cable, the proposed Marinus Link, proposed offshore wind zones, commercial fishing and proposed fish farm expansion.

Woodside's consultation material assesses each impact as "localised" and in isolation. This fails to consider the combined pressure on Sea Country and its species. We ask that a full cumulative impact assessment be done.

18. Decommissioning and legacy

Bass Strait already has a large and growing decommissioning liability, with ageing platforms, wells and pipelines. Adding new wells and about 35 km of new flowlines increases that liability and delays the removal of existing infrastructure. We ask that the plan set out:

- how the new infrastructure will be fully removed
- who will pay for removal
- how existing infrastructure will be decommissioned on time rather than having its life extended.

19. What's missing

The project itself

- Production volumes: the sheets describe "four previously appraised undeveloped gas reservoirs" but give no reserves, flow rates or field life. (Reference.)
- The project is split across plans: this plan covers drilling, installation and pre-commissioning only. Surveys, commissioning, startup and operations "would be executed under other EPs." No one can see the full impact of the project in one place.
- Unclear what is covered: the activity list includes "startup activities associated with introduction of hydrocarbons", but the same sheet says startup belongs to another plan.
- It may not go ahead: the project still depends on "policy certainty" and a final investment decision. People are being consulted on something that may change or never happen.
- Locations are provisional: well locations are "subject to change" after seabed surveys and well design.
- Gas composition: there is nothing on CO_2 content, ethane or condensate share. This matters because Kipper-area gas is high in CO_2 and needs CO_2 removal at Longford.
- Onshore impacts left out: the extra processing at Longford and the pipeline throughput are not assessed.
- "Up to" wells and kilometres: the sheets give upper limits, not a firm design.

Greenhouse gas emissions

- Described as "localised impact with no lasting effect": this is scientifically wrong for greenhouse gases.
- No figures at all: the sheets give no tonnes, even for the drilling campaign.
- Scope 3 not mentioned: nothing on the emissions from burning the product, which is by far the largest impact.
- No climate assessment: nothing on how the project fits with the Paris Agreement, Australia's legislated targets or the Safeguard Mechanism. The only "control" offered is NGER reporting, which records emissions rather than reducing them.
- Venting and flaring: "contingency flaring and venting" is mentioned, but with no volumes or duration limits.

Spill risk and the EMBA

- The EMBA map has no detail: it gives no probabilities, shoreline contact times or volumes of oil reaching shore. It doesn't name the coastlines or islands affected, including Tayaritja. (Reference.)
- Worst-case release not stated: the sheets give no blowout volume, flow rate or duration.
- Relief-well timing not stated: the Source Control Emergency Response Plan (SCERP) only needs to be "in place prior to drilling." The sheets don't say how long it would take to stop a blowout.
- Spill response plan not released: the response depends on an "approved OPEP" that we haven't seen.
- Contradictory wording: the release is "highly unlikely", but the sheets also say the affected part of the EMBA would be "specific and minimal." The second claim can't be known in advance.
- Unclear what drives the EMBA: the sheets don't say which well or scenario sets its size. East Pilchard, at about 90m deep, is the deepest and furthest east of the four.

Marine life and the environment

- Protected areas left out: only the nearest marine parks are listed. These are Beware Reef, about 40km away, and Beagle Marine Park, about 120km away. The proposed Tayaritja Wukalina milaythina muka IPA isn't mentioned, and neither are other protected areas inside the EMBA. (Reference.)
- Whales: blue whales, southern right whales and humpbacks aren't named, and no Biologically Important Areas (BIAs) or seasonal timing are given. Whale protection is limited to legal compliance and observations "as required."
- Noise: there is no noise modelling or source levels, and no seasonal restrictions on activity.
- Drilling chemicals: synthetic or oil-based muds (non-water-based muds, NWBM) are allowed "subject to technical justification", with no limit. Chemical names and discharge volumes aren't given.
- Seabed impacts: no seabed habitat mapping is shown. The pre-lay survey will happen after the plan is approved.
- Cumulative impacts: the sheets mention that other operations and decommissioning may run at the same time, but don't assess the combined effects. The map leaves out other existing oil and gas infrastructure.
- Decommissioning: there is no plan, timeline or funding for removing the new wells, about 35km of flowlines and about 32km of umbilicals.
- Important Bird Areas and Ramsar sites: The Franklin Sound Islands Important Bird Area the Furneaux Ramsar lagoons.

Cultural heritage and consultation

- There has been, as far as we are aware, no assessment of Sea Country values: cultural heritage is covered by inductions, an "Unexpected Finds Procedure" and a desktop review of seabed data. There is no assessment of specific Palawa or other Traditional Owner values. Intangible heritage is only covered as far as it is linked to the environment. (Reference.)
- Only "where appropriate": Woodside will include cultural knowledge only "where appropriate", without saying what this constitutes or who decides, which could mean non-Aboriginal people determine what happens to Aboriginal cultural values.

- No mention of consent: FPIC isn't mentioned, and there's no process for Traditional Owners to say no.
- Unclear who is being consulted: the summary sheet doesn't name which Traditional Owner groups it considers relevant, or whether Palawa people are included.
- Unfinished summary sheet: it includes a "Figure X" placeholder, which suggests it was rushed.
- Risks played down: the summary sheet for Indigenous communities gives a simplified "very unlikely" framing and refers readers back to the main sheet for impacts.
- No clear way to change the plan: the measures are "subject to change" and may not match the final plan. There's no explanation of how feedback will change the outcome. (We don't believe it will, but it should.)
- Change of operator: Woodside took over from Esso on 1 July 2026, but the sheets say nothing about Woodside's own capacity, liability or financial assurance for these assets.

20. Recommendations

To NOPSEMA

1. Do not accept the SWWEP Drilling and Subsea Installation Environment Plan.
2. Find that consultation with Palawa people has not been adequate, because the information needed to assess the full impacts of the project has not been provided.
3. Require any future assessment to cover the whole project, including commissioning, startup and operations, rather than splitting it across separate Environment Plans.
4. Require a full assessment of lifetime emissions, including scope 1, 2 and 3 emissions, and of their consistency with Australia's legislated targets and the 1.5°C goal of the Paris Agreement.
5. Require a full assessment of impacts on blue whales, southern right whales, and other protected species across the entire EMBA, including the cumulative impacts of existing industrial activity in Bass Strait.

To Woodside

1. Publicly commit not to proceed without the free, prior and informed consent of Palawa people and other Aboriginal communities affected, consistent with Woodside's Indigenous Communities Policy and Indigenous Peoples Strategy 2026–2030. Our organisations do not consent to this proposal.
2. Publish the information needed for informed consent, including:
    - forecast production and field life for each well
    - lifetime greenhouse gas emissions
    - the worst-case blowout volume and how long it would take to stop
    - the likelihood and timing of oil reaching Tayaritja and the north-east coast of Lutruwita / Tasmania
    - the Oil Pollution Emergency Plan and Source Control Emergency Response Plan.
3. Identify the proposed Tayaritja Wukalina milaythina muka Indigenous Protected Area and Palawa Sea Country in the Environment Plan. Fund a Palawa-led assessment of the cultural values at risk.
4. Develop any spill response planning for the Furneaux Group and Lutruwita with Palawa people, and with Palawa people's decision-making authority over it.
5. Publish a decommissioning plan and financial assurance for all new and existing infrastructure.
6. Engage our organisations as an affected parties in all further plans and decisions relating to this project, with enough time and resources to respond.

To the Australian and Victorian Governments

1. Approve no new fossil fuel reservoirs in Bass Strait or elsewhere, consistent with the remaining 1.5°C carbon budget and the International Energy Agency's net zero pathway, which includes no new long-lead-time oil and gas fields.
2. Make free, prior and informed consent a legal requirement for offshore petroleum activities affecting Aboriginal Sea Country, consistent with the United Nations Declaration on the Rights of Indigenous Peoples.

Contact

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Appendix

The titles

National Offshore Petroleum Titles Administrator (NOPTA) seabed gas and oil field production licences:

- Production Licence – VIC/L2
- Production Licence – VIC/L10
- Production Licence - VIC/L25

Woodside partner Esso diagram of oil and gas fields

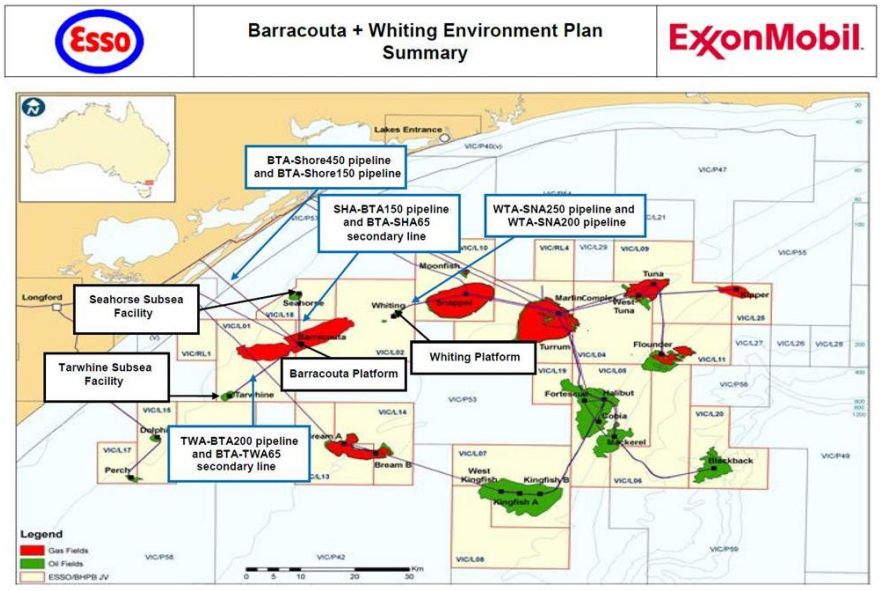
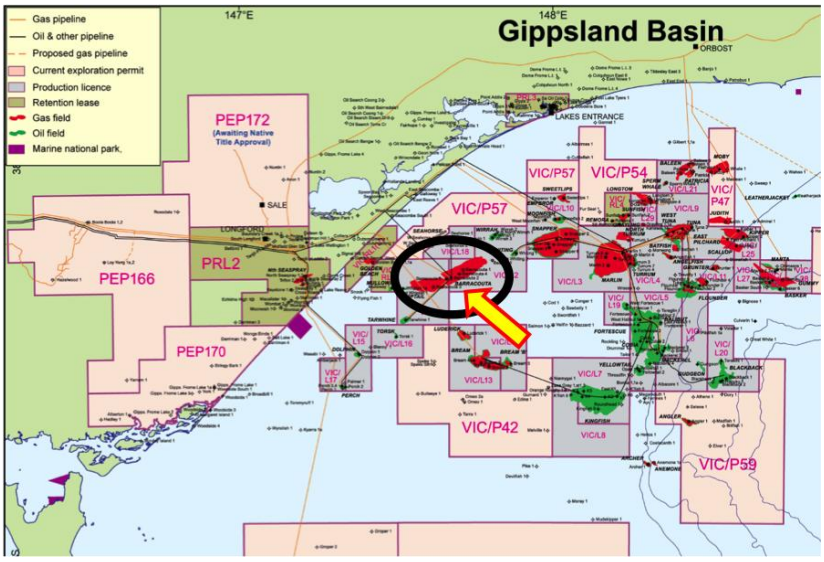


Figure 1 Esso production facilities in Bass Strait

Gippsland Basin



Ends.