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21 November 2022

Attn: Ms Beatriz Balbin
Chief Special Procedures Branch
Office of the United Nations High Commissioner for Human Rights
Palais Des Nations
1211 Geneva 10
Switzerland

Dear Ms Balbin,

Response to the Joint Communication from Special Procedures – AL OTH 91/2022

We refer to the Joint Communication (the Communication) dated 22 September 2022 sent by the Working Group on the issue of human rights and transnational corporations and other business enterprises and five additional Special Rapporteurs working on related mandates relating to Woodside Energy's (Woodside) Scarborough gas project and Pluto LNG Facility on the Burrup Peninsula (Murujuga) in the Pilbara region of Western Australia. Murujuga is the Aboriginal name for the Dampier Archipelago and surrounds, including the Burrup Peninsula and Murujuga National Park.

As noted in our letter of 13 October 2022, Woodside treats the issues that the Special Procedures have raised seriously, and we appreciate the opportunity to respond.

Woodside wishes to utilise this opportunity to clarify several matters raised in the Communication to support a wider understanding of the projects in question and the way we conduct our business. This includes our approach to engagements with all stakeholders including Traditional Custodians. These are set out in our attached submission.

Thank you once again for the opportunity to respond to issues raised in the Communication. We trust that our responses have provided clarity on the projects in question, and that the information provided will assist the Working Group and Special Rapporteurs in their consideration.

We would be pleased to meet with the Working Group and Special Rapporteurs to discuss our responses and to answer any further questions.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Tony Cudmore".

Tony Cudmore
Executive Vice President Strategy and Climate

Attached:

- Woodside's response to matters raised in the Communication



Woodside's response to matters raised in the Communication

About Woodside

Woodside has operated natural gas and liquefied natural gas (LNG) facilities on Murujuga in Western Australia for more than 35 years, delivering natural gas to customers in Australia and around the world. Woodside has a proven track record of safe and reliable operations. Woodside builds long-lasting relationships with the communities in which we are active. We demonstrate respect for the culture and values of the Indigenous communities where we are active and are proud of the partnerships that we have established.

Woodside's business conduct is guided by our values, policies and procedures including our Board approved [Human Rights Policy](#), [Indigenous Communities Policy](#), [Climate Policy](#) and [Code of Conduct](#) which are included on our website.

In line with our Human Rights Policy, approved by our Board our business conduct is informed by the UN Guiding Principles and acknowledges the unique relationships that Indigenous communities have to land and water. Our engagements are guided by the UN Declaration on the Rights of Indigenous Peoples (UNDRIP).

We listen and seek to understand the interests and concerns of communities and stakeholders regarding our activities. We continue to engage across all phases of our activities through community forums, regular meetings, surveys and distribution of communication materials.

Woodside is a member of [Ipieca](#), the global oil and gas association for advancing environmental and social performance. Woodside has publicly stated our commitment to the Ipieca Principles which include support for key UN frameworks including the Paris Agreement and the UN Guiding Principles.

We also engage with our peers in the resources and energy sectors through the Human Rights Resources and Energy Collaborative. The group provides a forum for sharing human rights experiences including in relation to supply chain issues and remedy.

Our [Sustainable Development Report 2021](#) summarises our sustainability approach, health and safety performance, social and cultural impacts including human rights, progress on our climate change strategy and other key sustainability topics.

Clarification regarding "Burrup Hub project"

The Communication refers to the "Burrup hub" or "the Project", which appears to describe multiple different industry activities owned by and under the management of various companies that are active on Murujuga. For clarity, our response is directed only at activities operated by Woodside for which the Communication seeks information, namely the Scarborough and Pluto Train 2 expansion projects.

The Scarborough field is located approximately 375 km off the coast of Western Australia. Scarborough gas will be developed through new offshore facilities connected by an approximately 430 km pipeline to a second LNG train (Pluto Train 2) at the existing Pluto LNG onshore facility, with first LNG cargo expected in 2026. Links to fact sheets on these projects are provided [here](#).

The Communication outlines six matters requesting our response. Please see the following information below in response to the matters raised.

QUESTION 1: ADDITIONAL INFORMATION AND COMMENTS

Climate change

The Intergovernmental Panel on Climate Change has stated that "it is unequivocal that human influence has warmed the atmosphere, ocean and land". An objective of the Paris Agreement is to hold "the increase in the global average temperature to well below 2°C above pre-industrial levels" and to pursue "efforts to limit the temperature increase to 1.5°C".

Woodside's climate strategy is to reduce our net equity greenhouse gas emissions, while investing in the products and services that our customers need as they reduce their emissions.

Woodside sets and reports company-wide targets to reduce Scope 1 and 2 greenhouse gas emissions on a net equity basis, including both operated and non-operated assets. These targets are to reduce net equity Scope 1 and 2 greenhouse gas emissions by:

- 15% by 2025
- 30% by 2030

Towards an aspiration of net zero by 2050 or sooner.¹

Woodside's targets are absolute reduction targets from an historically established baseline, aiming to deliver net emissions reduction even as Woodside grows its business and makes new investment decisions in accordance with its capital allocation framework. Woodside can achieve its net equity Scope 1 and 2 greenhouse gas emissions reduction targets in three ways:

- Avoiding greenhouse gas emissions through the way we design our assets;
- Reducing greenhouse gas emissions through the way we operate our assets; and
- Originating and acquiring offsets for the remainder.

We also see a significant ongoing role for Woodside's LNG production to support our customers' decarbonisation commitments. Some additional relevant attributes of natural gas are:

- When used to generate electricity, natural gas emits around half the life cycle emissions of coal;²
- In the form of LNG, natural gas is transportable and flexible between destinations, which is an advantage during an uncertain and potentially volatile energy transition;³ Natural gas can also help address poor air quality which can cause material health impacts.⁴ Compared to coal and biomass combustion, natural gas is relatively low in particulates, sulphur dioxide and nitrous oxides that can contribute to poor air quality.^{5,6}

The decarbonisation plans of Woodside's target markets provide insight into their future energy mix and inform Woodside's strategy. Under the terms of the Paris Agreement each country submits its "Nationally Determined Contribution" (NDC) to the Agreement's goals. These NDCs summarise national targets and plans. They are published by the United Nations Framework Convention on Climate Change (UNFCCC) secretariat.

In 2021 our three major markets (Japan, China and Republic of Korea) updated their Nationally Determined Contributions under the Paris Agreement and set mid-century "net zero" goals.⁷

The IPCC Sixth Assessment Report, *Climate Change 2022: Mitigation of Climate Change*, the Working Group III contribution, page TS-30 has data in Table *TS.2: Comparison of key characteristics of mitigation pathways with immediate action towards limiting warming to 1.5-2°C vs. pathways following current 2 NDCs until 2030*, that provides ranges in primary energy from gas in 2030 (% relative to 2019) for all scientific pathways assessed in the IPCC report. The pathways that follow current NDCs until 2030 (following announcements at COP26 in Glasgow) indicate the median value for gas demand pathways increasing by 15% relative to 2019, whilst meeting the objectives of the Paris Agreement.

Pluto Train 2 and Scarborough

Woodside has interim and long-term targets to achieve net zero greenhouse gas (GHG) emissions by 2050 at Pluto LNG. The Pluto Greenhouse Gas Abatement Program (Pluto GGAP) includes an interim target to abate 30% of emissions by 2030 and long-term targets to abate 100% by 2050, relative to the Pluto LNG

¹ Target is for net equity Scope 1 and 2 greenhouse gas emissions, relative to a starting base of the gross annual average equity Scope 1 and 2 greenhouse gas emissions over 2016-2020 and may be adjusted (up or down) for potential equity changes in producing or sanctioned assets with an FID prior to 2021.

² IEA 2019. "The role of gas in today's energy transitions", page 4. All rights reserved

³ IEA 2020. Website accessed 2022. <https://www.iea.org/commentaries/record-year-for-gasliquefaction-investment-lights-a-path-towards-market-flexibility>. All rights reserved.

⁴ World Health Organisation. Website accessed 2022. www.who.int/westernpacific/health-topics/air-pollution

⁵ IEA 2019. Website accessed 2022. <https://www.iea.org/articles/does-household-use-of-solid-biomass-based-heating-affect-air-quality>. All rights reserved

⁶ Progress in Energy and Combustion Science 2018. "The role of natural gas and its infrastructure in mitigating greenhouse gas emissions, improving regional air quality, and renewable resource integration", page 66.

⁷ The Paris Agreement was adopted on 12 December 2015. Please refer to <https://www.unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement/>

Development Public Environmental Review (2006) emissions estimate of 4.1 Mtpa CO₂-e for two LNG trains. The targets include the proposed expansion of the Pluto LNG onshore facility, which includes modifications to the existing Train 1, construction of a second gas processing train (Pluto Train 2) and additional domestic gas infrastructure.

Woodside is proposing to develop the Scarborough gas resource through new offshore facilities connected by an approximately 430 km pipeline to the proposed expanded Pluto LNG onshore facility.

Scarborough gas would primarily be processed through Pluto Train 2. The Scarborough reservoir contains approximately 0.1% carbon dioxide and the proposed design of Pluto Train 2 adopts the best available proven technology to improve efficiency.

State and Commonwealth primary environmental approvals for Pluto LNG were granted in 2007, which allowed for the construction of two LNG trains and associated infrastructure. An area for a second train was pre-prepared during the foundation project in 2007-2008. Under relevant conditions of the existing State environmental approval, Woodside has updated its Pluto GGAP to include the scopes of work related to the expansion of Pluto LNG and to address the Western Australian Government's Greenhouse Gas Emissions Policy for Major Projects (State GHG Policy) introduced in August 2019. The Pluto GGAP is reviewed and updated every five years (as a minimum) and includes an update of emissions from the facility, emissions avoided or offset to date and a summary of Woodside's performance against GHG emission reduction targets.

The purpose of the Pluto GGAP is:

- To ensure the plant is designed and operated in a manner that achieves reductions in GHG emissions to as low as reasonably practicable (ALARP)
- To provide for ongoing GHG emissions reductions over time
- To ensure through the use of best practice, the total net GHG emissions and/or GHG emissions per unit of product from the project are minimised
- To manage GHG emissions in accordance with the Framework Convention on Climate Change 1992, and consistent with Australia's United Nations Framework Convention on Climate Change (UNFCCC) commitments under the Paris Agreement (formerly the National Greenhouse Strategy)
- To demonstrate Woodside's commitment to its Climate Change Policy and alignment to the State GHG Policy.

The Pluto GGAP was approved by the Western Australian Minister for Environment in June 2021. Further information is contained in the following link to the Pluto GGAP factsheet, available on our [website](#).

Respectfully, we do not accept the accuracy of the study cited in the Communication regarding greenhouse gas emissions from the Scarborough project. For clarity, the total Scope 1 and 3 emissions from the project are estimated to be 878mt over the project life (778.5mt Scope 3, 99.5mt direct emissions). This data is in accepted regulatory approval documents.

By 2030, emissions from Scarborough and Pluto Train 2 are expected to account for less than 0.8% of Australia's national emissions.⁸ A significant volume of energy will be produced from the Scarborough resource. Used to generate electricity, Scarborough could power the homes in ten cities the size of Perth, Western Australia for thirty years, doing so with around half of the greenhouse gas emissions that would be produced if this electricity were to be generated by coal.

Respect for Cultural Heritage

Murujuga has been listed on Australia's National Heritage List, which recognises the outstanding Aboriginal cultural values of the area. Woodside is committed to the management, protection and research of the National Heritage values under the Burrup [Conservation Agreement](#), signed by Woodside and the Commonwealth Government in 2007. This commitment was further reaffirmed through the signing of the Deep Gorge Joint Statement (2017) (later renamed Ngajarli Joint Statement). This tripartite agreement includes commitments to continuing to deliver positive and enduring outcomes for Murujuga and exploring opportunities beyond existing arrangements to continue the positive outcomes already achieved under the Conservation Agreements.

Woodside has publicly supported the reviews of the Aboriginal Heritage Act 1972 (WA), the Environment Protection and Biodiversity Act 1999 (Cth) and the Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth). Our submissions consistently noted the need to meet expectations of cultural heritage

⁸ Noting this calculation assumes Australia meets its 43% emissions reduction target.

management and Indigenous engagement. In all instances, Woodside supported legislative application and reforms that recognise the central role of Traditional Custodians to heritage management, and that builds on successful examples of collaborative heritage processes and coexistence. For example, Woodside supports World Heritage Listing of the Murujuga Cultural Landscape on the basis of our demonstrated coexistence with the universally significant natural and cultural heritage values. Woodside continues to work closely with the Murujuga Aboriginal Corporation and Ngarda-Ngarli Traditional Custodians to ensure the ongoing protection of cultural heritage values.

Murujuga Aboriginal Corporation (MAC)

MAC is the approved body corporate as set out under the Burrup and Maitland Industrial Estates Agreement (BMIEA). The BMIEA is an agreement between the Western Australian (WA) Government and three previously registered native title claim groups. MAC was established to represent the members of Native Title claims over Murujuga, collectively known as the Ngarda Ngarli and comprising Ngarluma, Yindjibarndi, Yaburara, Mardudhunera and Wong-Goo-Tt-Oo people. It represents over 1200 members and is governed by a board elected to represent all five Aboriginal groups. MAC is guided by the Murujuga Circle of Elders who hold cultural authority and exercise a continuation of traditional decision-making processes as envisioned under Article 18 of UNDRIP.

MAC also owns and co-manages the Murujuga National Park, it maintains responsibilities for the Dampier Archipelago National Heritage Place and is progressing the World Heritage nomination of the Murujuga Cultural Landscape. Although the Native Title determination resulted in no native title being found over the lands subject to the BMIEA or below the low water mark, Woodside continues to apply the principles of self-determination guided by UNDRIP by ensuring we consult and work through the acknowledged Representative Aboriginal Corporation (being MAC).

We maintain deep pride in the constructive co-existence with cultural heritage that our operations have achieved over time. We seek to avoid future damage or disturbance to the environment and cultural heritage and if avoidance is not possible, we commit to minimise and mitigate the impacts.

Agreement with Traditional Custodians

Woodside has the following benefit sharing and conservation agreements relevant to Scarborough and Pluto Train 2:

- The Burrup and Maitland Industrial Estates Agreement (BMIEA) undertakings (2007)
- MAC Forward Plan Agreement (2019)
- Burrup Conservation Agreement (2007) reaffirmed through the Ngajarli Joint Statement (2017).

Woodside committed to fulfilling certain BMIEA undertakings relating to land payments and employment and business contracting when it acquired leases for the Pluto LNG development in 2007.

Woodside's agreements with Indigenous groups do not contain 'gag clause' provisions. Traditional Custodians are supported, resourced and encouraged to participate in cultural heritage activities, consultation and regulatory processes.

Our Indigenous land agreements and Conservation Agreement have been key to bringing the community, industry and government agencies together with the common goal of delivering mutual benefits, including social and economic opportunities, and cultural heritage management and protection. We are proud of the results we have achieved together and look forward to continuing to work with our partners to deliver meaningful outcomes for Indigenous communities.

Indigenous communities, including Traditional Custodians, continue to benefit from our operations. We believe that our host communities broadly value our presence and our contributions through financial benefit agreements, social investments, direct and indirect employment and Indigenous contracting opportunities. Woodside plays an active role in contributing to the well-being of our communities and creating a more sustainable future including via our [social contributions](#).

Woodside is clear that support for our operations and developments from our host Indigenous communities remains contingent upon caring for Country, improving economic and social outcomes, and supporting the transmission of cultural knowledge from old people to young people.

Other processes

The Australian regulatory regime facilitates engagement with interested parties on assessment decision making processes. The Communication identifies statutory and court-based processes that are currently underway in relation to Woodside activities. These include:

- Section 9 and 10 of the Aboriginal and Torres Strait Islander Heritage Protection Act
- Federal Court proceedings relating to Commonwealth environmental approval processes for Scarborough
- The appeals lodged against the EPA Report as part of the statutory approval process under the Western Australian Environmental Protection Act (noting this is in relation to the North West Shelf Extension Project not the Scarborough project).

Woodside actively engages in these processes through the relevant forums.

QUESTION 2: ENVIRONMENTAL APPROACH AND APPROVALS

Woodside recognises that strong environmental performance is essential to our business. Our environmental approach complies with all applicable environmental laws and regulations and is underpinned by science-based decisions. Woodside has an established methodology to identify impacts and risks and assess potential consequences of activities. The aim of risk and impact assessments is to inform the appropriate management of impacts (e.g. prevent, control, mitigate and/or manage impacts) to a level determined to be acceptable and ALARP.

Embedded in the approval process are the principles of ecologically sustainable development and the consideration of relevant international conventions.

Woodside engages with stakeholders across all phases of our activities through community forums, regular meetings, surveys and distribution of communication materials. In addition, stakeholder consultation is embedded in the required primary and secondary environmental approval processes as relevant to the projects below.

Pluto LNG

The Western Australian Environmental Protection Authority (EPA) completed its assessment of the Pluto LNG proposal in July 2007 (EPA Report No. 1259). Ministerial Statement 757 (MS 757) was issued in December 2007 granting approval for the construction and operation of two LNG processing trains. Existing Commonwealth and State primary environmental approvals for Pluto LNG allowed for two LNG trains and supporting infrastructure, and its commercial structure was designed to facilitate third-party gas processing. An area for a second train was pre-prepared within the foundation project in 2007-2008. Minimal further earthworks are required within this previously disturbed land for Pluto Train 2 construction. Woodside has operated the Pluto LNG facility safely and reliably since start-up in 2012.

As noted on page 4 of this response, the Pluto GGAP was contemporised in 2021 to include an interim target to abate 30% of emissions by 2030 and long-term targets to abate 100% of emissions by 2050.

Scarborough

The Scarborough project has been the subject of environmental assessments by a range of regulators including the Australian National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA), the Commonwealth of Australia Department of Climate Change, Energy, the Environment and Water (DCCEEW), and the EPA.

In 2014 NOPSEMA became the sole Commonwealth regulator for environmental management of offshore petroleum activities following streamlining of regulatory processes under the Offshore Petroleum Greenhouse Gas Storage Act and the Environmental Protection and Biodiversity Conservation Act see Scarborough Offshore Project Proposal (OPP) available [here](#).

In 2020, NOPSEMA accepted the OPP for the Scarborough project. The OPP presents the assessment of the potential environmental impacts and risks associated with the Scarborough project. It is an early stage, whole-of-project assessment which forms the basis for future activity-specific environment plans (EPs) that are

currently being prepared and submitted to NOPSEMA and will be required to be assessed and accepted prior to any offshore activity related to Scarborough can commence.

Preliminary consultation commenced in 2018 and Woodside continues to consult with stakeholders in relation to the proposed Scarborough project.

As part of this process a broad range of consultation activities were undertaken as outlined below:

- external communication including, communication on our website, factsheets, direct emails to stakeholders and other communication tools such as advertising in local, state and national newspapers
- Holding community forums and group meetings with a broad range of stakeholders including Indigenous stakeholders
- Holding one-on-one meetings between environment, stakeholder and project management representatives.

Following submission of the environmental documentation with the regulators there was a formal consultation period by way of public review.

Scarborough spans both Australian and Western Australian jurisdictions. Activities in State waters include dredging, pipelay, sand backfill and pipeline installation operations. The State waters activities were assessed and approved under the Western Australian Environmental Protection Act 1986 (EP Act) and the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). A proposal for activities in State waters was referred to the EPA and the Commonwealth Department of Agriculture, Water and Energy (DAWE). The DAWE referral decision of 'Not a controlled action' was released on 12 August 2019. Implementation authorisation was granted by the WA Minister for Environment on 11 August 2021 by way of Ministerial Statement 1172. Further information is available via the [Scarborough development factsheet](#).

Aboriginal rock art

Woodside acknowledges the significance of Murujuga's cultural heritage values, including its National Heritage Listed rock art and proposed World Heritage Outstanding Universal Values. Our heritage management approach and support for the World Heritage Listing of Murujuga reflects successful coexistence of industry and heritage, which is embedded in our processes, procedures and the commitment of our people. Our Indigenous Communities Policy, is guided by UNDRIP and includes the recognition of Indigenous peoples' rights to maintain, control, protect and develop their cultural heritage, traditional knowledge and traditional cultural expressions.

Existing Operations at Pluto LNG are subject to a Cultural Heritage Management Plan (CHMP) and the Conservation Agreement (2007). Annual audits of heritage sites within our leases are conducted by an independent archaeologist and Traditional Custodians to ensure the ongoing management and provide confidence to the Indigenous community their cultural heritage is adequately protected. This process also assists to maintain the connections of the Ngarda Ngarli people to their traditional lands and heritage. Results are reported to the Western Australian Department of Planning, Lands and Heritage, and the 2021 report found that no damage, disturbance or interference was identified to any of the Aboriginal heritage sites or features within our lease areas.

The approved second LNG train is being constructed entirely within previously disturbed land which was subject to comprehensive archaeological and ethnographic survey. CHMPs are in place for this construction to ensure existing heritage sites are not impacted.

Submerged heritage studies

Woodside has also engaged with researchers to investigate the potential for Indigenous archaeological material to remain on the sea floor from a time when sea levels were lower and the land would have been exposed and inhabited. We have pro-actively sought to understand the potential heritage values of the submerged cultural landscape for the proposed Scarborough pipeline by engaging with MAC and the same heritage experts who were involved with the ground-breaking discoveries in Murujuga's waters to conduct an archaeological assessment that is the first of its kind in Australia. This research project concluded the development proposal is likely to have nil to low impact on archaeological heritage. In particular, the Scarborough project will not impact any submerged igneous rock, which could potentially contain undiscovered

examples of Murujuga's internationally significant petroglyphs. An executive summary of the research project is publicly available on [here](#).

In 2020 Woodside commissioned MAC to undertake a further ethnographic survey with Elders and traditional knowledge holders to identify any intangible or other heritage values associated with the Scarborough project, particularly beyond the shoreline. This work did not identify any heritage sites which would be impacted by the project. At the request of MAC, in 2022 Woodside commissioned a further review of existing Side Scan Sonar geophysical data for stone structures such as traditional fish traps. This work was conducted by an experienced underwater archaeologist and did not identify any archaeological or other cultural features. These assessments have been conducted in consultation with Indigenous community members and included detailed consultation with MAC on the development of a CHMP. The assessments have also been informed by the Burra Charter, UNDRIP and other national and international guidance.

Emissions studies

Peer-reviewed research has not identified any impacts on Burrup rock art from dark smoke or industrial emissions associated with LNG production. In 2002 the Western Australian Government established the Burrup Rock Art Monitoring Management Committee (BRAMMC) to assess the impacts of industrial emissions on the rock art of Murujuga. Research conducted by the BRAMMC included measurements of air quality, microclimate, dust deposition, colour change and mineral spectrometry; microbiological analyses; air dispersion modelling; and laboratory simulations of chemical impacts at contemporary, predicted and 10-times predicted pollutant estimates.

In 2009 the BRAMMC reviewed all of these studies and concluded that "there is no scientific evidence to indicate that there is any measurable impact of emissions on the rate of deterioration of the Aboriginal rock art in the Burrup" and recommended technical working group be established to continue long-term monitoring.

In 2010 the Burrup Rock Art Technical Working Group (BRATWG) was established. Under the BRATWG and the Western Australian's government departments monitoring of colour change was continued by the CSIRO.

In 2016, the BRATWG commissioned an extreme condition weathering study to investigate the effects of different concentrations of acids on weathered rock surfaces. These studies found that the dissolution of chemicals began at lower pH levels than previously estimated (pH 3 for aluminium, manganese and iron), but was recognised as a preliminary study and did not provide a definitive result.

In 2019 the Western Australian Department of Water and Environmental Regulation released the Murujuga Rock Art Strategy, which builds on the research to date and will establish world best practice program to monitor, evaluate and report on factors that could affect the condition of the rock art. Woodside supports Traditional Custodian led and independently managed monitoring programs to give stakeholders and the broader community confidence in the preservation of Murujuga's National Heritage Listed and World Heritage Tentative Listed cultural heritage. Woodside provides support for the Murujuga Rock Art Monitoring Program (MRAMP) which is jointly overseen by MAC and the Western Australian Department of Water and Environmental Regulation. The MRAMP is expected to provide reliable information on changes and trends in the condition of the rock art and whether the rock art is showing signs of accelerated change. This will further guide management and protection of Murujuga's rock art.

Social Impact Assessments

Through our established social performance framework, we seek to understand the expectations of the communities where we are active and share timely information about our activities. This is consistent with Woodside's approach to engaging stakeholders as outlined in our Sustainable Communities Policy, Human Rights Policy and Indigenous Communities Policy available [here](#).

Woodside regularly reviews the potential impacts and opportunities of its projects and operations on local communities through social impact assessments including human rights. To complete social impact assessments, we analyse relevant statistical data and reports about the local area. We also engage with local stakeholders including Indigenous peoples to better understand community issues and how we may impact the community.

Social Impact Assessments were undertaken by external consultants for Scarborough and Pluto Train 2, this included consideration of human rights.

QUESTION 3: MEASURES TAKEN RELATED TO FPIC

Woodside has consulted extensively with Indigenous community members through the offering of public information sessions, maintaining an office open to community in Roebourne (excluding a brief closure due to COVID case numbers), and formal consultation since at least 2018 with elected representative institutions guided by traditional decision-making processes and knowledge holders as envisioned by the UNDRIP.

Woodside recognises there can be a diversity of views within Indigenous communities. We acknowledge the importance of FPIC processes and traditional decision-making. Woodside has resourced the appointed representative institutions for Traditional Custodians to engage independent expert advisers to provide inputs and comments into the regulatory approvals for our projects, including secondary approvals relating to environment and heritage matters.

In 2019 Woodside voluntarily signed an extended Forward Plan Agreement with MAC in contemplation of the Pluto Train 2 and Scarborough projects. This agreement builds on the existing support Woodside provides for the protection, preservation and management of the nationally heritage-listed Burrup Peninsula. It is in addition to the BMIEA and was an important milestone in the history of coexistence between Woodside's project and Indigenous heritage on Murujuga. Please also see Woodside's Indigenous Communities Policy available [here](#).

QUESTION 4: ENVIRONMENTAL LAWS AND HUMAN RIGHTS STANDARDS

In addition to introductory statements regarding our approach to business conduct, Woodside complies with Australian federal and state legislation and is subject to robust regulatory processes. Our policies apply to our global operations and, where relevant, refer to specific international frameworks or policies. The Australian environmental regulatory framework embeds the principles of ecologically sustainable development.

Our Health, Safety and Environment Policy, available [here](#), includes the key principle of complying with relevant laws and regulations and applying responsible standards where laws do not exist. Our business activities are subject to extensive regulation and government policy in each of the countries where we do business.

The Woodside Management System defines our key business activities to ensure a unified way of working. Our regulatory compliance framework assists Woodside to proactively maintain relationships with governments and regulators within countries that support base business and future growth opportunities. In 2021, we revised our process to ensure it is fit-for-purpose and aligned with internationally recognised compliance standards.

We are committed to continuous improvement in the performance of our operations by minimising the impact our activities have on the environment. Our environmental approach complies with all applicable environmental laws and regulations and is underpinned by robust science-based decisions.

We work to minimise our environmental impacts by integrating world-class environmental management into our activities and the design, construction, operation and decommissioning of our facilities. We continue to deliver sound and transparent environmental regulatory approvals for our activities. Our focus is on achieving better environmental outcomes by building our credible scientific knowledge, robust environmental impact assessment and effective risk management. Additional information on scientific knowledge is available [here](#). We rely on having evidence-based scientific knowledge to support our understanding of the local environment to inform environmental risk evaluation of our potential impacts upon it.

We report publicly on our environmental performance through our annual sustainable development report.

The range of environmental legislative requirements applicable to the offshore component of the Scarborough project is set out in section 3 of the Scarborough OPP. For specific information about our environmental management approach please see [here](#).

Please see question 5 for information on our approach to human rights.

QUESTION 5: HUMAN RIGHTS

Woodside is committed to conducting business in a way that respects the human rights of all people, including our employees, the communities in which we are active, and those working within our supply chains. Please also see Our Approach to Human Rights document available [here](#).

Woodside's approach to human rights is overseen by our Board and the Executive Leadership Team. The Board's Sustainability Committee is responsible for reviewing and making recommendations to the Board on Woodside's human rights policy and performance.



Our business conduct is informed by the UN Guiding Principles in our procedures and guidelines, which support our operations. Our Human Rights Policy provides the basis of Woodside's human rights approach and is supported by the human rights commitments in Woodside's Code of Conduct and other relevant policies such as our Indigenous Communities Policy. Responsibility for the application of our policies rests with all Woodside employees, contractors and joint venturers engaged in activities under Woodside operational control. Woodside managers are also responsible for promotion of our policies in non-operated joint ventures.

We also expect our suppliers to respect human rights as set out in our Supplier Code of Business available [here](#). Our supply chain human rights framework sets out our relevant due diligence activities including screening of suppliers considered high-risk.

We periodically update our salient human rights risk assessment with the support of external business and human rights experts to identify the potential human rights at risk of the most significant impact through our activities and business relationships.

Woodside considers human rights throughout the life of a project including in risk assessments and supplier selection. We conduct new social impact assessments, including those related to human rights, for all major development activities.

In line with the UN Guiding Principles, Woodside is committed to taking steps to remedy any adverse human rights impacts on individuals, workers and communities that we identify we have caused or contributed to. If we are directly linked to an adverse impact through our supply chain or other business relationship, we will consider whether we play a role in remediation.

All employees, contractors and service providers undergo mandatory training on the Code of Conduct when they join the company and annual compliance training thereafter. The Code of Conduct includes information about Woodside and its employees' responsibilities to respect human rights.

Woodside also has an online Human Rights Awareness training module for our employees in high-risk areas of the business and a range of mandated Cultural Awareness training for our Australian-based employees. The Human Rights Awareness training covers our human rights responsibility and approach, the risk of modern slavery in our operations and supply chains, Australia's modern slavery legislation, and human rights in the global oil and gas sector. The Cultural Awareness training covers the history, rights and interests of Australian Indigenous Peoples.

Human rights in line with the UNGPs

Woodside's commitment to respect human rights is expressed in our Human Rights Policy available [here](#) and further in Our Approach to Human Rights available [here](#). In line with the UNGPs, Woodside has a policy commitment to meet our responsibility to respect human rights, a due diligence approach and a process to enable remediation of any adverse human rights impacts that Woodside may cause or contribute to. We continue to embed our commitment in operational processes and procedures.

Traditional Custodians are central to Woodside's heritage management to ensure cultural views are understood and remain protected. We acknowledge our approach to managing and protecting cultural heritage has improved over time. Traditional Custodians were central to the heritage management process for the design and construction of Pluto LNG in the mid-2000s. Traditional Custodians participated in comprehensive cultural heritage surveys and helped Woodside to develop our CHMPs. Most importantly, their engagement and the cultural heritage survey outcomes prompted an engineering redesign of the initial Pluto LNG plant to both avoid and protect the most significant heritage sites.

Today our approach continues to be informed by Traditional Custodians, heritage experts and government regulation. We recognise it is important to demonstrate continuous improvement in strengthening this engagement and believe our efforts to date have increased the effectiveness of our engagement with Traditional Custodians.

QUESTION 6: GRIEVANCE MECHANISMS

We take stakeholder concerns about our activities seriously and encourage all stakeholders to speak up about misconduct or other concerns about adherence to our commitments, policies and procedures. We have both a global whistleblowing channel as well as localised community grievance mechanisms across our operations. These provide a framework for receiving and responding to grievances in a consistent, respectful and timely way and are adapted where necessary in consideration of local communities. Stakeholders can lodge a



grievance with us using a variety of channels as detailed on our website including telephone, mail and email, or they may contact or visit their closest Woodside office.

In 2021 we received 10 community grievances from our operational areas. Concerns received related to contracting and job opportunities, vacant housing, land management and road safety. All grievances were addressed and discussed with relevant community members. Our recorded grievances have increased over the past few years, as a result of implementing localised grievance mechanisms into each of our operational areas, making communication more accessible for relevant stakeholders.

Woodside's community grievance framework enables prompt and respectful receipt, investigation and response to concerns from stakeholders in our operational areas. The associated mechanisms are available to those who feel Woodside's activities have impacted them. [Community Concerns - Woodside Energy](#).

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Woodside trusts that this information will assist Working Group and Special Rapporteurs in reviewing the matters raised in the Communication. Woodside is available to discuss these matters further as would be helpful to the Working Group and Special Rapporteurs.