

NOTICE TO CARRY OUT ENVIRONMENTAL AUDIT PROGRAM

(Issued pursuant to Section 48(1) of the *Waste Management and Pollution Control Act 1998*)

ISSUED TO: Ichthys LNG Pty Ltd
ACN 150 217 299

OF: 100 St Georges Terrace
Perth WA 6000

WHEREAS the Northern Territory Environment Protection Authority (NT EPA) is satisfied for the reasons stated in **Attachment A** to this notice that you are a person required to carry out an Environmental Audit Program in relation to the Ichthys LNG facility, located at N.T. Portion 07002 plan(s) S2011/201A&B, 144 Wickham Point Road, Wickham as delineated in yellow in **Attachment C** (the premises) to evaluate:

- (i) *The ability of management systems to manage waste or prevent, reduce, control, rectify or clean up pollution or environmental harm resulting from pollution [s 47(a), WMPC Act];*
- (ii) *the extent to which actions required to be taken, or results required to be achieved, for waste management or the prevention, reduction, control, rectification or clean up of pollution, or environmental harm resulting from pollution, have been taken or achieved [s. 47(b), WMPC Act]*

to accurately report pollutant emissions and rectify the pollutant emission underreporting as defined in paragraph 12 of Attachment A at the premises.

NOW TAKE NOTICE that you are required to comply with each of the requirements specified in **Attachment B** to this notice on and from the date of issue of this notice.

ISSUE DATE: 13 March 2026



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COLIN JOSEPH WOODWARD
DELEGATE OF THE NT EPA

Important Notice

Failure to comply with this notice is an offence under Section 52 of the *Waste Management and Pollution Control Act 1998* and may incur significant penalties and/or other statutory action.

This notice takes effect on the date on which it is served upon you. Pursuant to Section 108 of the *Waste Management and Pollution Control Act 1998*, **you have the right to apply for a review of the decision to issue you with this Notice to carry out an Environmental Audit. If you intend to apply for a review, YOU MUST MAKE AN APPLICATION NOT LATER THAN 28 DAYS after the day on which this Notice of the decision was given.** For information on how to lodge an application for review, contact the Northern Territory Environment Protection Authority, telephone 8924 4041.

Pursuant to Section 112 of the *Waste Management and Pollution Control Act 1998* the person issued with this notice must fulfil certain obligations before selling, leasing, sub-leasing, giving or exchanging land, premises, a vehicle or business which is the subject of this Notice.

ATTACHMENT A

REASONS FOR ISSUING THIS NOTICE

1. Ichthys LNG Pty Ltd (Ichthys LNG) occupies and controls NT Portion 07002 plan(s) S2011/201A&B, 144 Wickham Point Rd, Wickham, also known as the Ichthys LNG facility as delineated in yellow in **Attachment C** (the premises).
2. Ichthys LNG operates the gas pipelines and liquefaction infrastructure located at the premises.
3. Ichthys LNG holds Environmental Protection Licence (EPL) 228-05 issued pursuant to s. 34(1) of the *Waste Management and Pollution Control Act 1998* (NT) (the Act). EPL228-05 authorises the operation of a premises for processing hydrocarbons so as to produce, store and/or despatch liquified natural gas (LNG) or methanol, where the premises are designed to produce more than 500,000 tonnes annually of liquefied natural gas and/or methanol; subject to the conditions of the licence.
4. LNG production, such as that which occurs at the premises, is a source of emissions of nitrous oxides (NO_x), sulphur dioxide (SO₂), particulate matter less than 2.5 microns in aerodynamic diameter (PM_{2.5}), volatile organic compounds (VOCs), inclusive of benzene, toluene, ethylbenzene and xylenes (BTEX) and formaldehyde, hydrogen sulphide and mercury, amongst other pollutants.
5. Health impacts of VOCs, including benzene, depend on the concentration and length of exposure to elevated levels. At levels exceeding safe thresholds, VOCs can cause acute and short-term impacts to human health, including dizziness, headaches, eye, nose and throat irritation. Long-term exposure can lead to harmful effects on bone marrow, neurocognitive suppression and stress on the liver and kidney, and is known to cause cancer.¹
6. Condition 62 of EPL228-05 states: *The licensee must calculate quarterly estimates for release of total particulates, CO₂ [carbon dioxide], NMVOC [non-methane volatile organic compounds] and CH₄ [methane] from each of the authorised stationary source emission points.* Appendix 3 of EPL228-05 sets out the stationary emission points, including release points: A13-2 and A14-2 which are the release points for Acid Gas Removal Unit (AGRU) offgas which has by-passed the Acid Gas Incinerator (AGI).
7. Condition 77.6 of EPL228-05 requires Ichthys LNG to provide total emissions to air in tonnes per year for the air quality parameters listed in Table 6 in Appendix 3 of the EPL in an Annual Environmental Monitoring Report (AEMR) due on 30 September each year.
8. Condition 41 requires Ichthys LNG to incorporate design features that minimise emissions of benzene to the maximum extent practicable.
9. Facilities which exceed the reporting thresholds set out in the *National Environmental Protection (National Pollutant Inventory) Measure 1998* (NPI NEPM) for the above and other substances must estimate and report on their pollutant emissions and transfers annually to the National Pollutant Inventory (NPI).

¹ [SA Health](#)

10. The *Environment Protection (National Pollutant Inventory) Objective 2004* (NPI EPO), is a declared Environment Protection Objective pursuant to s 22(1) of the Act. Clause 3(1) of the NPI EPO obliges the occupier of premises at which a reporting threshold for a substance is exceeded during a reporting period to provide to the Chief Executive Officer a report in an approved form within three months after the end of the reporting period. Clause 5 of the NPI EPO sets out how emissions are to be estimated.
11. On 15 October 2025, the NT Environment Protection Authority (EPA) became aware that Ichthys LNG had provided reports under the NPI EPO and in the AEMRs which underestimated the volume of volatile organic compounds (VOCs) emitted to air by the facility. Ichthys LNG provided a briefing to the NT EPA on 22 October 2025. Ichthys LNG indicated that the emission of some compounds, such as benzene, were underreported for 2023/2024 by orders of magnitude.
12. On 4 December 2025, Ichthys LNG provided the Department of Lands, Planning and Environment with the report *Ichthys LNG – Review of NPI Reporting System* prepared by ERM (**Attachment D**). **Attachment D** details the findings of ERM’s review of Ichthys LNG’s emissions estimation methodologies. **Attachment D** included findings, amongst others, that:
 - (a) Ichthys LNG’s Emission Management and Reporting (EMR) Tool underestimated emissions from AGRU hot venting and other minor sources;
 - (b) an independent re-calculation for the 2023/2024 NPI report indicated that pollutant emissions were underestimated;
 - (c) site-specific emissions factors used by Ichthys LNG for estimating emissions from some sources could not be traced to a reference.
13. As a result of the methodological deficiencies identified in **Attachment D**, pollutant emissions from the Ichthys LNG facility have been underreported to both the NPI and the Department of Lands, Planning and Environment in AEMRs submitted under EPL228-05 and previous versions of the licence (“the underreporting”).
14. **Attachment D** recommended the following actions to improve the accuracy of future NPI submissions:
 - (a) Derive site-specific emission factors based on direct measurement data for combustion sources.
 - (b) Update condensate storage emissions to be based on site-specific data.
 - (c) Ensure consistence in substances reported from activities with fuel-specific emissions factors.
 - (d) Review all assay and activity data to ensure accuracy and suitability, with references to source information.
 - (e) Improve documentation and internal review methodologies by:
 - i. Preparing a Basis of Preparation for NPI reports
 - ii. Conducting internal reviews of each NPI report by appropriately qualified personnel, which should include source breakdowns of substances and year-on-year comparisons

- iii. Commissioning a regular third-party review of each NPI report prior to submission.
15. Measurement, estimation and reporting of pollutant emissions is a component of waste management at the Ichthys LNG facility and contributes to preventing, reducing and controlling air pollution and resulting environmental harm.
 16. The NT EPA uses the reported emissions to evaluate the extent to which pollution is being minimised and managed in accordance with EPL228-05 and the Act.
 17. Inaccurate or incomplete reporting of emissions undermines the ability of the NT EPA to effectively evaluate risks to the environment and human health and assess compliance with relevant legislative requirements.
 18. The emissions calculation methodology and reporting governance must be revised to ensure accurate pollutant emission reports are provided. Ichthys LNG has informed the EPA that emission calculations for previous years are under review.
 19. To ensure that the revised historical and future emissions estimates are accurate and complete, an evaluation is required of the extent to which actions have been taken to rectify the underreporting and to ensure appropriate monitoring, estimation and reporting.

ATTACHMENT B

NOTICE REQUIREMENTS

1. Pursuant to section 48(1) of the *Waste Management and Pollution Control Act 1998* Ichthys LNG Pty Ltd (Ichthys LNG) (ACN 150 217 299) is required to carry out an environmental audit program (the program) at the premises (as identified in **Attachment C**) to evaluate:

- (i) ***The ability of management systems to manage waste or prevent, reduce, control, rectify or clean up pollution or environmental harm resulting from pollution [s 47(a), WMPC Act];***
- (ii) ***the extent to which actions required to be taken, or results required to be achieved, for waste management or the prevention, reduction, control, rectification or clean up of pollution, or environmental harm resulting from pollution, have been taken or achieved [s. 47(b), WMPC Act]***

to accurately report NPI pollutant emissions, and rectify the pollutant emission underreporting as defined in paragraph 13 of Attachment A at the premises.

2. The program must be performed by a person registered under section 68 of the *Waste Management and Pollution Control Act 1998* (the auditor).
3. By **30 March 2026**, Ichthys LNG must engage an auditor, registered under section 68 of the *Waste Management and Pollution Control Act 1998*.
4. Ichthys LNG must provide the details of the auditor commissioned to conduct the program, via email to environmentalregulation@nt.gov.au within **10 business days** of engagement.
5. By **15 April 2026**, Ichthys LNG must submit via email to environmentalregulation@nt.gov.au the scope of works for the program endorsed by the auditor.
6. By **30 June 2026**, Ichthys LNG must submit, via email to environmentalregulation@nt.gov.au the results of the program in the form of an **Environmental Audit Report** prepared by the auditor.
7. The **Environmental Audit Report** must evaluate *the extent to which actions required to be taken [...] for waste management or the prevention, reduction, control, rectification or clean up of pollution, or environmental harm resulting from pollution, have been taken or achieved* to rectify the pollutant emission underreporting as defined in **Attachment A** and in any way connected with pollutant emission reporting at the premises.
8. The **Environmental Audit Report** must include an assessment of:
 - (a) The extent to which management plans, procedures and pollution emission reporting conducted at the premises are capable of determining accurate and comprehensive pollutant emission estimates; and
 - (b) An assessment of the extent to which Ichthys LNG has implemented the recommendations set out in ERM, 2025 (**Attachment D** and Paragraph 14 of **Attachment A**)as determined by:

- (a) review of systems, plans, procedures, monitoring programs, data, records, reports or information that is relevant to the scope of the audit as the auditor sees fit;
- (b) inspection of activities, processes, plant and equipment at the premises that is relevant to the scope of the audit as the auditor sees fit; and
- (c) collection and/or modelling of data that is relevant to the scope of the audit as the auditor sees fit.

9. The **Environmental Audit Report** must:

- (a) consider all relevant guidance including, but not limited to, the *National Environment Protection (National Pollutant Inventory) Measure 1998* and the *Environment Protection (National Pollutant Inventory) Objective 2004*;
- (b) determine the level of accuracy that can be achieved using the management plans, procedures and processes in place for estimating emissions at the premises;
- (c) identify the areas where uncertainty is introduced to emission estimates;
- (d) provide an assessment of whether the level of uncertainty in emissions estimates is acceptable. Where an unacceptable level of uncertainty is identified, recommend the measures necessary to reduce uncertainty to an acceptable level; and
- (e) propose a reasonable timetable for implementation of recommended measures.

ATTACHMENT C

THE PREMISES

SITE LOCATION AND PROPERTY EXTENT (DELINEATED IN BRIGHT YELLOW)



ATTACHMENT D

ERM, 2025