



15 September 2025

NSW Department of Planning, Housing and Infrastructure  
Locked Bag 5022  
Parramatta  
NSW 2124

To Whom It May Concern

**Re: Letter of Support - Application Number DA35/98-Mod-6: MOD 6 Chlorine Liquefaction Plant**

The Queensland Water Directorate (**qldwater**) is the central advisory and advocacy body, working with our members to provide safe, secure and sustainable urban water. In providing these essential services, the urban water sector owns and operates sewer lines, water mains, water and wastewater treatment plants, pumping stations, and other critical water technologies and infrastructure.

**qldwater** members are the 73-water services providers who have domestic connections across Queensland including 69 councils, the two council owned statutory authorities in south-east Queensland, and the two state-government owned statutory authorities.

There are 370 water supply schemes and 265 sewage schemes across Queensland. Our members currently service 1,943,244 sewerage and 2,118,050 drinking water connections. These numbers are set to substantially increase with current and projected population growth, requiring new infrastructure and the expansion and optimisation of existing infrastructure assets. These assets require a range of chemicals to operate and ensure safe water and water services for our communities.

The use of gaseous chlorine by Queensland's drinking water sector is preferred, particularly given the unique challenges that Queensland experiences (hotter climates and long road transportation distances to communities).

Sodium hypochlorite (NaOCl) is the chemical currently used by many water service providers for disinfecting water and making drinking water safe to consume. However, NaOCl solutions decompose to produce chlorate (ClO<sub>3</sub><sup>-</sup>) and chlorite (ClO<sub>2</sub><sup>-</sup>) ions and the rate of decomposition increases with heat and over time, both of which are significant factors for Queensland's remote and regional communities. Research indicates that chlorate can pose a health risk to consumers when above threshold concentrations in drinking water.

Gaseous chlorine is a stable, easier product to transport, but supply into Queensland has been challenging leaving communities, (particularly northern remote communities) with no option but to utilise NaOCl, despite the risks it poses.



IXOM's proposed Botany plant expansion to add the capability to produce bulk and packaged liquefied chlorine gas would provide Queensland and Australian utilities with an option for a second source of supply and thereby increase the sovereign supply chain resilience of this critical product.

**qldwater** understands that the project will achieve this by:

- Providing a contingency source capable of supplying 100% of the Australian bulk and packaged liquefied chlorine gas market at short notice, in the event of a catastrophic failure of the IXOM Laverton plant; and,
- Removing the need for water utilities to rely on imports as a supply contingency for chlorine gas, therefore mitigating risk arising from international shipping disruptions, international chlorine production levels and/or Australia's access to international supply chains.

For the reasons outlined above, **qldwater** strongly supports IXOM's development application to construct and operate a new chlorine liquefaction and packaging plant at its facility in Botany, NSW. The NSW plant will also reduce road transport distances and associated costs for utilities in Queensland.

Please do not hesitate to contact me if you have any questions.

Yours sincerely

A handwritten signature in blue ink that reads "Georgina".

Georgina Davis  
Chief Executive Officer