

Department of Planning & Environment
GPO BOX 39
SYDNEY NSW 2001

REFERENCE

DE-2022/153

Date

12 December 2022

Development	BlueScope Steel – Commodity Logistics and Import Project (SSI-36408005) Request to Provide Advice on EIS
Location	Pt Lot 1 DP 606434, Pt Lot 1 DP 606434, Pt Lot 1 DP 606434 Lot 1 DP 837554 Five Islands Road PORT KEMBLA NSW 2505

Dear Sir/Madam

Thank you for the opportunity to comment on the proposed Commodity Logistics and Import Project - Upgrade to Berth Facilities used by Bluescope Steel. Following on from Council's letter of 23 February 2022 in relation to the SEARS, Council has reviewed the documentation for the above project and provides the following comments.

General commentary

Overarching concerns raised in Council's letter of the 23 February 2022 included:

- cumulative noise and pollution levels and associated amenity impacts on adjoining access roads and potential impacts to Council assets
- risks of chain reactions with cumulative hazardous operations.

The EIS notes "potential for cumulative traffic impacts to be generated during construction, particularly with the 6BF reline project if it were to be constructed at the same time as the project. However, as there is ample capacity within the local road network to handle construction traffic generated by the project, cumulative impacts will not be significant". The EIS states traffic generation is expected to be primarily in relation to construction traffic which is constituted of approximately 100 light vehicle movements with no additional truck movements on the public road network. In terms of cumulative impacts, particularly in relation to the 6BF reline project, the EIS notes cumulative impacts of the two projects are unlikely to change the level of service of affected intersections.

Council notes the preparation of a Preliminary Hazard Analysis in regard to management of potential off-site impacts and that this report concluded hazards with potential off-site impact can be suitably controlled using the nominated safeguards. It is also noted that in regard to the ongoing regulation and monitoring of the proposed development, this will fall largely to the NSW EPA under the Environmental Protection Licence. Council will therefore defer any future environmental issues with the site to the NSW EPA for action.

Generally speaking, Council is mindful of the challenge of balancing the need for steel currently reliant on coal for production (for numerous industries and undertakings including sustainability projects) along with the necessity of reducing greenhouse gas emissions.

The position and influence of BlueScope in the local and broader industrial framework presents a unique opportunity to set an example of how such a challenge can be incorporated into industrial activity. Council supports BlueScope in taking all possible steps in working toward carbon neutrality.

Additional general matters recommended to be taken into consideration in any approval are outlined below.

Environmental factors

- Noise and Vibration: Once 85% operational, noise validation at sensitive receivers must be conducted with a further noise validation assessment undertaken once 100% operational. The consent conditions should include that all works required to address any recommendations arising from that assessment to be actioned.
- Air Quality Impact Assessment: Once 85% operational, modelling validation at sensitive receivers must be conducted with a further modelling validation assessment undertaken once 100% operational. Any consent conditions should include that all works required to address any recommendations arising from that assessment to be actioned.
- Water Impact Assessment: Prior the construction phase existing mitigation measures must be assessed and upgraded as needed to address possible water impacting events due to the increased construction activity. Additionally, during the operational phase it is recommended an assessment of the current mitigation measures in place to ensure capacity has/will not be overloaded during a water impacting event following the site changes.
- Green House Gas Assessment:
 - The greenhouse gas report supplied in relation to the Commodity Logistics and Import Project (CLIP) does not consider the wider and more immediate impacts of associated emissions. The CLIP is integral to the larger CSSI project involving the Blast Furnace #6 reline which will have significant prolonged emissions impacts for the region. Whilst the direct emissions from CLIP may be negligible in terms of PKSW's overall emissions, they are in addition to the larger project which will be a significant source of PKSW's overall emissions. Additionally, the report does not consider significant scope 3 downstream and upstream emissions including fugitive emissions from the extraction of the coal product and its use in the steel making process.
 - The report does not consider the CLIPs impact on the NSW State Government's interim target of a 50% emissions reduction on 2005 levels and Federal interim target of a 43% on 2005 levels by 2030, ignoring the urgent emissions reductions required in the short term to achieve the recommendations of the IPCC report, as stated in section 4.2.1 Intergovernmental Panel on Climate Change. Additionally, the report does not consider the significance PKSW's operations and emissions have in a local context. The Wollongong City Council Climate Change Mitigation Plan 2020 is referenced however the region's emissions inventory is excluded being 7,974,000 t CO₂e for 21 FY. According to the information provided in section 5.2.3 Emissions Inventory, PKSW's Scope 1 & 2 contribution to this is 86%, the CLIP and associated larger projects will continue to have significant influence on this regional inventory and are not negligible in this context.

Traffic matters

- Based on the documentation provided, there are not expected to be any significant adverse impacts to the local road network during construction or operation following completion. It is however noted that parking areas suggested for use during construction appear heavily used currently. It that regard it is not clear how the expected 100 construction vehicles per day anticipated are to be accommodated.

Heritage matters

- Heritage (Aboriginal) – including an assessment of the likely Aboriginal impacts of the project including consultation with Aboriginal stakeholders having regard to the Aboriginal Cultural Heritage Consultation Requirements for Proponents (OEH, 2010).

- There is evidence of consultation with ILAL and Illawarra Aboriginal Corporation and the Environmental Impact Statement notes:

The PKSW site does not contain known Aboriginal items or sites. The project will be undertaken on heavily disturbed, reclaimed lands. Excavations into natural material are not anticipated to be required to construct the project and therefore the likelihood of unexpectedly encountering Aboriginal heritage items is low.

- Heritage NSW should be consulted with and provide comment on whether Section 7.2.2 and 9.4.2 satisfactorily address the Aboriginal Heritage Requirements. Council should be provided with these comments.
- No additional historic heritage matters are raised and Part 9.4.5 of the EIS satisfactorily considers potential impacts, noting there are no listed heritage items in the vicinity and the proposal involves the upgrade of infrastructure which post dates the 1960s-70s.
- The unexpected finds conditions proposed in the EIS are supported.

If you have any questions regarding the above, please contact me on the telephone number below.

This letter is authorised by

Nigel Lamb

Senior Development Project Officer
Wollongong City Council
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