

Rose-Anne Hawkeswood
Senior Environmental Assessment Officer
Resource & Energy Assessments
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Hawkeswood,

Port Kembla Gas Terminal (CSSI 9471)

Thank you for inviting Port Authority of NSW (Port Authority) the opportunity to comment on the Port Kembla Gas Terminal project (CSSI 9471) (the Project).

Port Authority has reviewed the Project and provides the following comments.

A commitment is made in the EIS (Executive Summary – Hazard and Risk) that:

A detailed safety case will be developed for the project in accordance with the Work Health and Safety Act 2011 and Work Health and Safety Regulation 2017. The safety case would require separate approval from SafeWork NSW and would provide further detailed assessment of safety risks, emergency planning and management systems informed by the detailed design of the project.

Port Authority requests that the proponent be required to develop the detailed safety case in consultation with Port Authority. Port Authority has some safety and risk concerns regarding the Project and want to ensure that the detailed safety case benefits from Port Authority's expertise as mariners and in managing commercial shipping.

Port Authority would like further clarification on whether or not flaring will be included as a mitigation in the event of a breakdown of the regasification plant or other controlled or uncontrolled release of gas. If flaring is to be included as a potential mitigation measure, there will need to be an assessment of the impact of flaring on passing ships, adjacent flammable coal stocks and the planned flammable bulk liquid facility opposite the site. Potential impacts should be assessed for a range of weather conditions, including prevailing conditions. In addition, noise impacts of any proposed flaring on site personnel and for nearby sites should be assessed. If flaring is not to be included as a mitigation measure, further clarification is sought to confirm why this would not be required and outline what appropriate alternative mitigation measures are being proposed.

Port Authority would also like further clarification of, in the event of a breakdown in the pathway to the Eastern Pipeline, how long it's estimated that the FSRU would be able to retain LNG boil-off before requiring release to atmosphere. It is essential that this is understood as this will relate directly to the time it will take to remove the ship from Port Kembla should the need arise. For this scenario, it should also be considered if

all connections to shore, including the discharge arms, should have automatic break-away devices fitted for emergency removal of the ship should it be necessary.

The written approval of the Harbour Master is required for any proposed works that will disturb the bed of a port or are otherwise captured by clause 67ZN of the *Ports and Maritime Administration Regulation 2012* (Regulation). Harbour Master approval will therefore be required in relation to any works associated with the Project that will disturb the bed of Port Kembla.

Port Authority acknowledges and supports the management measures relevant to the Harbour Master and Port Authority.

Please don't hesitate to contact Captain Roger Kirk, Acting Harbour Master & General Manager Port Kembla (02 4275 0142; RKirk@portauthoritynsw.com.au) for further information on the matters raised above.

Yours sincerely,



Ryan Bennett

Senior Planning & Sustainability Manager

14 December 2018