

23 September 2025

To the NSW Department of Planning, Housing and Infrastructure,

This letter is regarding IXOM's State Significant Development (SSD) Modification Application [**Application Number DA35/98-Mod-6: MOD 6 Chlorine Liquefaction Plant**] to construct and operate a new chlorine liquefaction and packaging plant at its chlor alkali facility in Botany, NSW. Gaseous chlorine is the primary chemical used by water utilities for water sanitization.

Suez provides drinking water services to over 14 million Australians through its long-term service contracts with water utilities in NSW, SA and WA. In Greater Sydney, Suez uses gaseous chlorine as the primary chemical for the disinfection of the drinking water that it produces at the Prospect Water Filtration Plant that supplies more than 80% of Sydney Water's customers in the city. Suez has high dependency on the existing supply chain of gaseous chlorine sourced from the Laverton facility in Victoria.

The Water Services Association of Australia (WSAA) is leading a sector-wide effort, under the approval of the ACCC, to improve the resilience of the chlorine gas supply chain.

Suez is an active member of WSAA and is a strong supporter of the sector wide initiative to improve the resilience of the chlorine gas supply chain for the reasons below:

- The current reliance on a single bottling plant in Australia presents a sovereign risk, due to a reliance on international supplies as a backup in the event of a major disruption.
- In 2020, the Australian Government released its Sovereign Manufacturing Capability Plan which, amongst other things, identified a need to improve Australia's supply chain resilience for certain critical products. Water treatment chemicals, and specifically chlorine gas, was identified as a critical product category. The Australian Government's Future Made in Australia initiative's 'Economic Security and Resilience' stream also supports sectors vital to Australia's national interest but prone to supply chain disruptions by providing support to attract private investment in these critical areas.
- IXOM's Laverton facility in Victoria is currently the sole packaging facility for liquefied chlorine gas in Australia. Although IXOM's Botany facility in NSW also manufactures chlorine, it is used in the production of other chlorine-based products and no chlorine gas is produced as a finished product.

IXOM's proposed Botany plant expansion will

- Add capability to produce bulk and packaged liquefied chlorine gas would provide an option for a second source of supply and thereby increase the sovereign supply chain resilience of this critical product.
- Provide 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 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 access to international supply chains.

For the reasons outlined above, IXOM's development application to construct and operate a new chlorine liquefaction and packaging plant at its facility in Botany, NSW aligns with the goals of improving supply security and avoiding sovereign risk in the event of a domestic supply disruption to gaseous chlorine.

Yours Faithfully,



Mark Lautre
Director
Suez Water Pty Ltd