

Sally Munk
Department of Planning, Housing and Infrastructure
Via: Major Projects Planning Portal
Attention: Sally Munk
E: sally.munk@planning.nsw.gov.au

Dear Sally,

Environmental Impact Statement Submission (SSD-41680467) – Auskelp “Eden-1” Kelp Aquaculture Farm Project

Thank you for providing Port Authority of New South Wales (Port Authority) with the opportunity to review and comment on the Environmental Impact Statement (EIS) for the proposed Auskelp “Eden-1” Kelp Aquaculture Farm Project (the Project). Port Authority is generally supportive of the Project, noting it relies on existing port and industrial infrastructure and is intended to avoid adverse impacts to navigation safety and port operations.

Port Authority is responsible for navigation, security and operational safety needs of commercial shipping in NSW ports, including safe navigation of shipping movements, pilotage, port security, emergency response (including marine oil and chemical spill response) and dangerous goods management. In the Eden/Two-fold Bay area, Port Authority’s interest is to ensure marine works, vessel movements and use of port assets are compatible with navigation safety requirements and any other operational constraints (including Defence and naval operations, where relevant).

The Project comprises a 200-hectare offshore kelp aquaculture development within Aquaculture Lease AL21/004 at Disaster Bay, off Wonboyn, cultivating the native brown kelp *Ecklonia radiata* using standard offshore longline infrastructure. The EIS indicates the farm will be located approximately 1.1 km offshore (nearest point) in waters generally 20–25 m depth over sandy sediments, with the layout designed to avoid mapped reef and sensitive habitats. The Project does not involve the addition of feed, fertiliser, pesticides, antibiotics or chemicals to the marine environment, and does not require dredging or seabed excavation (noting installation of helical screw anchors as part of the longline system).

Navigation safety and maritime operations

Port Authority notes the EIS states the farm layout incorporates appropriate navigation buffers, marker buoys and mapping (including AIS where required) to avoid interference with shipping routes and port operations, and that the lease location was selected to avoid shipping channels and high traffic areas.

Port Authority supports this approach and requests that detailed design and implementation confirm:

- (i) **surface marker specifications (including lighting, visibility and placement),**

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- (ii) **maintenance and inspection arrangements, and**
- (iii) **communication protocols for installation, servicing and any unplanned maintenance activities.**

The EIS identifies that construction, installation and servicing will be undertaken within suitable weather windows and maritime safety constraints, with vessel movements varying by stage. Noting the Project's proximity to naval infrastructure in Twofold Bay, Port Authority also supports the EIS commitment that operational scheduling will be coordinated to ensure compatibility with Defence and naval operations (including priority access for Defence-related movements where required).

Port Authority requests ongoing coordination regarding proposed vessel movements and work programs, including any activities that may affect navigational safety.

Onshore logistics and use of existing port/industrial infrastructure

Port Authority notes the Project benefits from co-location with existing land-based infrastructure within the Edrom industrial precinct and existing port facilities in the Eden/Twofold Bay area. The EIS indicates kelp-related infrastructure (rig assembly, anchor systems, floats and biomass handling) will be prepared using existing warehouses, storage sheds and hardstand areas, and that processing will occur within existing industrial/maritime uses with no new permanent land-based development proposed. The EIS also identifies mobilisation of vessels and equipment from existing port/wharf facilities (including Snug Cove and Edrom) and that marine operations will use private or commercial port infrastructure rather than public boat ramps. Port Authority supports the use of existing infrastructure, subject to confirmation of access arrangements and any operational constraints at relevant port assets.

Port Authority facilities

Port Authority is the owner of a number of facilities at Edrom and Snug Cove including:

- Edrom Multi-user wharf (MU Wharf) is owned and managed by Port Authority, with a 99 year lease to Defence
- William Allen Drive, Edrom
- Eden Cruise Wharf at Snug Cove, Eden
- Eden Ice Supplies.

Use of Port Authority facilities would require a commercial agreement to be entered into, including use of Edrom Multi-user wharf, Breakwater wharf, and access along William Allen Drive.

Port Authority requests Auskelp outline any planned wharf usage. Bookings are subject to availability (with priority to Defence), and berthing fees would apply.

Traffic impacts

The EIS notes that Edrom Road and William Allen Drive 'are not regularly used by the general public and do not service any significant residential areas (Edrom House and North Wonboyn – approximately 30 residents). As such, the roads have substantial existing capacity and are ideally suited to accommodate the low-impact, infrequent transport requirements of the kelp aquaculture operation. In this context, the additional traffic associated with the Eden-1 Kelp Aquaculture Farm represents a 21% increase of vehicle traffic compared only to local forestry uses and is not anticipated to place any measurable pressure on road capacity, site logistics, or public infrastructure.'

Port Authority requests clarification on Auskelp's proposed use of William Allen Drive, as the owner of the road.

Estimated vessel movements in the EIS (section 9.2) are much higher than the actual volumes in Twofold Bay; *'it is conservatively estimated that Twofold Bay experiences between 80 and 120 vessel movements per day, equating to approximately 58,000 to 88,000 vessel movements annually'*. Port Authority estimates around 20 vessel movements per day (6-8 woodchippers per year and 5-6 log ships per year). **The**

estimates of the increase on movements resulting from the proposal would therefore be higher than currently stated 4% of annual vessel traffic in the EIS; Port Authority requests the vessel traffic levels and relevant impacts be reviewed.

Eden Cruise Wharf access during Cruise visits

Port Authority notes that during cruise visits traffic movements around the Eden Cruise Terminal are limited, including to surrounding buildings such as the ice works and bait supply buildings, which may impact planned operations in this location. Access is still available during cruise visits, however, it is preferable to avoid these peak traffic periods for accessing this location due to the high number of pedestrians.

Environmental safeguards, biosecurity and incident response

Port Authority notes the EIS describes the Project as a non-intensive operation that does not involve feed, fertilisers, pesticides, antibiotics or other chemical inputs to the marine environment, and that onshore processing is intended to operate as a zero-waste model with no anticipated discharge to sewer, stormwater or the marine environment.

Port Authority supports these commitments and requests that management plans for construction and operation clearly address marine incident response (including spill prevention and response), reporting arrangements and responsibilities, and measures to manage biofouling and any waste generated during installation, maintenance and harvesting activities.

Consultation and ongoing coordination

Port Authority notes the EIS indicates Auskelp has consulted with Port Authority and Transport for NSW – Maritime regarding farm layout, infrastructure and vessel activities, and that Auskelp will continue working with relevant agencies through development and operations.

Port Authority supports ongoing engagement and requests that Auskelp continue to consult with Port Authority on detailed design, installation scheduling, navigation marking, and any proposed changes to the farm layout or operational profile.

Approvals and operational requirements

Port Authority notes the EIS identifies the Project is located outside formal port limits and is not anticipated to affect port operations; however, Port Authority operational guidelines may be relevant to vessel movements, navigation safety and incident reporting, and Port Authority will continue to engage with Auskelp and other agencies as required. **Where any works, access or activities intersect with Port Authority-managed assets or operational directions, appropriate permissions and operational clearances will be required prior to commencement.**

Port Authority provides the above comments for DPHI's consideration as part of its assessment of the Project. Please don't hesitate to contact me if you have any questions or require further information or clarification.

Yours sincerely,



Fiona McKay
Principal Environmental Planner

8 May 2026