



Our ref: OUT26/8488

Your ref: SSD-80824235

Rasmus Altenkamp

Planning Group

NSW Department of Planning, Housing and Infrastructure

13 July 2026

Subject: Air Liquide CO2 Processing Plant, Bomaderry (SSD-80824235)– Environmental Impact Statement (EIS)

Dear Rasmus Altenkamp,

I refer to your request for advice sent on 18 June 2026 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter. The assessment has been carried forward to the Water Advisory team of the Development Coordination Authority (DCA) which was established on 1 July 2026.

DCA Water Advisory has reviewed the EIS and makes recommendations to:

- Quantify the maximum annual volume of groundwater take due to aquifer interference activities for construction of the project.
- Assess the impacts in accordance with the NSW Aquifer Interference Policy should the groundwater take exceed 3 ML/yr.
- Identify and assess the dewatering infrastructure.
- Ensure water licence requirements are met.

Please see Attachment A for details.

Should you have any further queries in relation to this submission please do not hesitate to contact the DCA Technical Advisory at technical.advisory@dphi.nsw.gov.au

Rob Brownbill,
Principal Water Advisor
Development Coordination Authority
NSW Department of Planning, Housing and Infrastructure



Attachment A - Detailed advice to DPHI Planning & Assessment regarding the Air Liquide CO2 Processing Plant, Bomaderry (SSD-80824235) – Environmental Impact Statement

1.0 Aquifer interference assessment and water licensing

1.1 Recommendation – pre-determination

Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to:

- Quantify the maximum annual volume of water take due to aquifer interference activities required for construction of the project.
- Demonstrate sufficient water entitlement can be obtained unless an exemption applies.

Explanation

Insufficient information has been provided to confirm the potential groundwater take volumes due to aquifer interference activities required for construction of the project. The EIS has indicated the potential for dewatering for construction of the gas pipeline and the pile foundations required for the building footings. However, no assessment of seepage volumes has been provided. This is required to enable DCA Water advisory to understand the risks to the water source and users, and to advise on impact assessment and licensing requirements. Quantification of maximum potential inflow volumes is therefore required. Relevant guidelines to consider this are available at:

- <https://publications.water.nsw.gov.au/watergroupjspui/bitstream/100/4061/1/Minimum%20requirements%20for%20building%20dewatering.pdf>
- https://publications.water.nsw.gov.au/watergroupjspui/bitstream/100/889/1/Guidelines_for_Groundwater_Documentation_for_SSD-SSI_Projects_Technical_guideline.pdf

1.2 Recommendation – pre-determination

If the take of groundwater is found to be greater than 3 ML per year, DPHI should request the proponent to assess impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). Please refer to the following documents:

- <https://publications.water.nsw.gov.au/watergroupjspui/bitstream/100/2618/1/NSW%20Aquifer%20Interference%20Policy.pdf>
- <https://www.water.nsw.gov.au/sites/default/files/2025-07/Aquifer-Interference-Assessment-Framework.pdf>



Explanation

As per Recommendation 1.1 above, the EIS has not provided a volumetric quantification of groundwater take. Additionally, the EIS has not provided an assessment of impacts to groundwater due to construction of the project. DCA Water Advisory Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume and assess the impacts.

1.3 Recommendation – pre-determination

DPHI requests the proponent to identify all dewatering infrastructure required for the project and assess the impacts of their construction and operation.

Explanation

Insufficient information has been provided to understand the dewatering infrastructure, including water supply works eg. pumps/spearpoints/pipelines to facilitate the development and the impacts of their construction and operation. This is also required to enable exemptions to water legislation approval requirements under section 4.41 of the *Environmental Planning and Assessment Act 1979* to apply.

1.4 Recommendation – post approval

DPHI should request the proponent to obtain a water access licence (WAL) to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the *Water Management (General) Regulation 2025*.

Explanation

Under the *Water Management Act 2000*, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under the *Water Management (General) Regulation 2025* applies. An exemption may be available for water take during construction activities in coastal water sources until 30 June 2029 under Clause 6 of Schedule 4 of the WM Reg, or where the groundwater take during construction or operation is less than or equal to 3ML per water year (cl 19, sch 4 of WM Reg). To claim either of these exemptions certain requirements must be met, such as

- the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and
- the records are kept for 5 years.

Further information on these requirements and other information on licensing and approvals and exemptions, including a form to report and record water taken can be found at:

- <https://www.water.dcceew.nsw.gov.au/our-work/licensing-and-approvals> and <https://www.water.dcceew.nsw.gov.au/our-work/licensing-and-approvals/dewatering>