

Belinda Kennewell
Department of Planning Housing & Infrastructure
Email: Belinda.Kennewell@dpie.nsw.gov.au

10 April 2026

Ref No: F2017/00085

Dear Ms Kennewell,

RE: SEARs – Vopak Bulk Liquid Fuel Terminal SSD-111013738

I refer to the notification received via the Major Projects Portal requesting Council's input into the draft SEARs for the proposed Vopak Bulk Liquid Fuel Terminal SSD-111013738.

Council notes the project is seeking approval for the site preparation (including bulk earthworks and piling), construction and operation of a bulk liquid terminal on the site, with pipeline connections that connect into existing infrastructure at Bulk Liquids Berth 1, and Bulk Liquids Berth 2.

Council acknowledges the strategic importance of Port Botany and fuel supply infrastructure at a State level. Having regard to the nature, scale and location of the proposal, Council considers that the Environmental Impact Statement (EIS) be subjected to comprehensive risk-based assessment through the Secretary's Environmental Assessment Requirements (SEARs), consistent with the Environmental Planning and Assessment Act 1979 (EP&A Act).

Accordingly, these comments are provided in response to the scoping report prepared by Patch Planning and are requested to be considered in addition to those proposed in the Department's draft SEARs.

Key Issues

1. Hazards and Risk (Safety)

Council notes that the proposal exceeds (more than doubles) the storage thresholds for Class 3 flammable liquids and therefore constitutes potentially hazardous development under:

- Chapter 3 of State Environmental Planning Policy (Resilience and Hazards) 2021 (RH SEPP); and
- The former SEPP 33 framework, now implemented through the RH SEPP and associated guidelines.

In accordance with clauses 3.6–3.8 of the RH SEPP, Council requests that the EIS be supported by a comprehensive hazard and risk assessment framework, including:

- a) Confirmation of the development's classification as a potentially hazardous industry or hazardous storage establishment, including threshold screening and justification.
- b) Preparation of the following specialist studies, in accordance with Hazardous Industry Planning Advisory Papers (HIPAPs):
 - Preliminary Hazard Analysis (PHA) – HIPAP No. 6;
 - Hazard and Operability Study (HAZOP);
 - Fire Safety Study, addressing fire, explosion and escalation scenarios;

- Quantitative Risk Assessment (QRA), addressing individual and societal risk in accordance with HIPAP No. 4 (Land Use Safety Planning).
- c) Assessment of risks to:
 - On-site workers;
 - Adjacent industrial land uses;
 - Critical infrastructure and the broader community, including cumulative and domino risks within the Port Botany precinct.
- d) Consideration of risk impacts during construction, commissioning, operation, maintenance and abnormal events.
- e) A detailed safety management and emergency response framework, developed in consultation with:
 - Fire and Rescue NSW;
 - NSW Ports;
 - Relevant emergency and regulatory authorities.
- f) Assessment of risks associated with proximity to Sydney Airport, including potential impacts on aviation safety and operations, in consultation with Sydney Airport Corporation, Airservices Australia and CASA as required.
- g) Demonstration of compliance with:
 - Dangerous goods legislation and Australian Standards;
 - Relevant HIPAPs and NSW Ports Sustainable Development Code requirements.
- h) Identification of best-practice safety controls, including leak detection, automated shutdown systems, containment infrastructure and alert systems.
- i) Demonstration that residual risks are reduced to as low as reasonably practicable (ALARP).

2. Traffic and Transport

Pursuant to section 4.15 of the EP&A Act, Chapter 5 of the State Environmental Planning Policy (Transport and Infrastructure) 2021, and the NSW Ports Sustainable Development Code, Council raises concern regarding increased heavy vehicle movements and dangerous goods transport.

Council requests that the EIS include a comprehensive Traffic and Transport Impact Assessment, addressing:

- Construction traffic volumes, haulage routes and staging of construction works;
- Operational heavy vehicle movements, including dangerous goods vehicles;
- Impacts on Friendship Road, key port intersections and the wider port road network;
- Road safety and emergency response considerations, having regard to the Australian Dangerous Goods Code;
- Cumulative traffic impacts in combination with existing and approved port developments;
- A Construction Traffic Management Plan and Operational Traffic Management Plan;
- Demonstration that all vehicle queuing, loading and layover activities occur entirely within the site.

3. Noise and Vibration

In accordance with the Protection of the Environment Operations Act 1997 (POEO Act), NSW EPA guidelines (including the Interim Construction Noise Guideline and Noise Policy for Industry), and the EP&A Act, Council requests that the EIS include a detailed Noise and Vibration Impact Assessment that:

- Assesses construction noise and vibration from piling, excavation, demolition and heavy machinery;
- Considers operational noise from pumps, loading facilities, alarms, safety systems and vehicle movements;
- Assesses cumulative noise and vibration impacts, particularly in the context of prolonged construction and potential night-time works;

- Includes Construction and Operational Noise and Vibration Management Plans with monitoring and complaint response procedures.

4. Air Quality and Odour

Consistent with the POEO Act, EPA Approved Methods for the Modelling and Assessment of Air Pollutants in NSW, and the EP&A Act, the EIS must include an Air Quality and Odour Impact Assessment, addressing:

- Emissions from construction plant and operational combustion sources;
- Volatile organic compound (VOC) emissions from fuel storage, handling and transfer;
- Dust generation during excavation, piling and demolition works;
- Odour impacts under normal and upset operating conditions;
- Cumulative air quality impacts with surrounding industrial and port uses;
- Mitigation, monitoring and management measures consistent with EPA guidance.

5. Water Quality and Hydrology

In accordance with the Water Management Act 2000, the Protection of the Environment Operations Act 1997, the Coastal Management Act 2016, and the coastal and hazard provisions of the State Environmental Planning Policy (Resilience and Hazards) 2021, Council requests that the SEARs require a comprehensive, precautionary water quality and hydrology assessment, having regard to:

- The proximity of the site to Botany Bay and its hydrodynamic connection to Brotherson Dock and adjoining port waters;
- The presence of multiple existing and approved port developments, including the Port Botany Quayline Equalisation Project, which is expected to involve large-scale dredging, reclamation and extended marine works.
- The EIS must therefore address, at a minimum:
 - Stormwater management design, capacity and treatment performance under both construction and operational conditions;
 - Risks of spills, leaks or contaminated runoff affecting surface waters, groundwater and the estuarine environment;
 - Interactions with existing stormwater and wastewater infrastructure, including connections to legacy or outdated drainage systems within the Port Botany precinct;
 - Cumulative water quality impacts in combination with the Quayline Equalisation Project, including:
 - Increased turbidity;
 - Mobilisation of contaminants from marine sediments;
 - Overlapping construction timeframes and compound disturbance effects.

6. Soil and Ground Contamination

Consistent with Chapter 4 (Remediation of Land) of the State Environmental Planning Policy (Resilience and Hazards) 2021, the Contaminated Land Management Act 1997, and Council's adopted position on the Port Botany Quayline Equalisation Project, the SEARs must require a high level of contamination assessment and assurance, commensurate with the site's former hydrocarbon use and location within a highly modified industrial/marine environment.

The EIS must address:

- Disturbance of potentially contaminated soils associated with the former Qenos hydrocarbon facility;
- Management of any legacy contamination associated with the former Qenos hydrocarbon site;
- Management of any contamination risks arising from excavation, piling and pipeline connection works within the Bulk Liquids Precinct;

- The potential presence and mobilisation of legacy contaminants, including hydrocarbons, heavy metals and emerging contaminants such as PFAS, noting known contamination sources within the broader Botany Bay catchment.
- Soil handling, classification, transport and disposal procedures;
- Contingency measures for unexpected contamination discoveries;
- Demonstration that the site is suitable for the proposed use.

7. Greenhouse Gas Emissions and Climate Change

Pursuant to section 4.15(1)(e) of the EP&A Act and Ecologically Sustainable Development principles, Council requests a Greenhouse Gas and Climate Change Assessment that:

- Quantifies construction and operational greenhouse gas emissions;
- Identifies opportunities for emissions reduction through energy efficiency;
- Explores on-site renewable energy generation (e.g. solar);
- Provides for electric vehicle charging infrastructure;
- Addresses climate risk and adaptation measures relevant to a coastal port location, including worst case sea level rise scenario, extreme weather event and increased temperatures.

8. Social and Community Impacts

In accordance with the EP&A Act and the DPHI Undertaking Engagement Guidelines for State Significant Projects, the EIS should assess:

- Impacts on local amenity and community perceptions of safety;
- Interfaces with nearby hazardous facilities, including the Elgas cavern;
- Community consultation outcomes and how issues raised have informed mitigation and design;
- Potential cumulative social impacts arising from prolonged and overlapping construction activities.

9. Visual and Landscape Impacts

Pursuant to section 4.15 of the EP&A Act and the NSW Ports Sustainable Development Code, Council requests a Visual and Landscape Impact Assessment, addressing:

- Changes to the visual character of Port Botany;
- Visibility of tanks, pipe racks, structures and lighting from Yarra Bay and Bumborah Point;
- Opportunities for visual mitigation and design refinement.

10. Cumulative Impacts

Council emphasises the need for a comprehensive cumulative impact assessment, consistent with section 4.15 of the EP&A Act and relevant SSD guidance, particularly in relation to the Port Botany Quayline Equalisation Project, noting its anticipated five-year construction timeframe.

The EIS must assess cumulative impacts arising from overlapping construction periods with the Port Botany Quayline Equalisation Project, including:

- The interaction of the proposal with:
 - Existing bulk liquid terminals and hazardous facilities within Port Botany;
 - Approved and proposed developments, including the Quayline Equalisation Project and associated Bulk Liquid Berth works;
 - Foreseeable changes in dangerous goods profiles, volumes and handling practices over the operational life of the development.
- Noise, vibration, traffic, air quality and safety risks;
- Extended and repeated night-time works;

- Community fatigue and prolonged amenity impacts.

Thank you for the opportunity to provide input into the SEARS for this proposal. If you have any questions regarding the proposed inclusions, please don't hesitate to contact Bronwyn Englaro Senior Sustainability officer on 9093 6796 or Bronwyn.englaro@randwick.nsw.gov.au

Yours sincerely,



Stella Agaiotis

Manager Strategic Planning

Stella.agaiotis@randwick.nsw.gov.au

English If you need help to understand this letter, please come to Council's Customer Service Centre and ask for assistance in your language or you can contact the Telephone Interpreter Service (TIS) on 131 450 and ask them to contact Council on 1300 722 542.	Greek Αν χρειάζεστε βοήθεια για να καταλάβετε αυτή την επιστολή, παρακαλείστε να έρθετε στο Κέντρο Εξυπηρέτησης Πελατών της Δημαρχίας (Council Customer Service Centre) και να ζητήσετε βοήθεια στη γλώσσα σας ή τηλεφωνήστε στην Τηλεφωνική Υπηρεσία Διερμηνέων (Telephone Interpreter Service — TIS) τηλ. 131 450 και να ζητήσετε να επικοινωνήσουν με τη Δημαρχία τηλ. 1300 722 542.	Italian Se avete bisogno di aiuto per capire il contenuto di questa lettera, recatevi presso il Customer Service Centre del Municipio dove potrete chiedere di essere assistiti nella vostra lingua; oppure mettetevi in contatto con il Servizio Telefonico Interpreti (TIS) al 131 450 e chiedete loro di mettersi in contatto col Municipio al 1300 722 542.
Croatian Ako vam je potrebna pomoć da biste razumjeli ovo pismo, molimo dođite u Općinski služni centar za klijente (Council's Customer Service Centre) i zatražite pomoć na svom jeziku, ili možete nazvati Telefonsku službu tumača (TIS) na 131 450 i zamoliti njih da nazovu Općinu na 1300 722 542.	Spanish A la persona que necesite ayuda para entender esta carta se le ruega venir al Centro de Servicios para Clientes [Customer Service Centre] de la Municipalidad y pedir asistencia en su propio idioma, o bien ponerse en contacto con el Servicio Telefónico de Intérpretes [“TIS”], número 131 450, para pedir que le comuniquen con la Municipalidad, cuyo teléfono es 1300 722 542.	Vietnamese Nếu quý vị không hiểu lá thư này và cần sự giúp đỡ, mời quý vị đến Trung Tâm Dịch Vụ Hướng Dẫn Khách Hàng của Hội Đồng Thành Phố (Council's Customer Service Centre) để có người nói ngôn ngữ của quý vị giúp hay quý vị có thể liên lạc Dịch Vụ Thông Dịch qua Điện Thoại (TIS) ở số 131 450 và yêu cầu họ liên lạc với Hội Đồng Thành Phố (Council) ở số 1300 722 542.
Polish Jeśli potrzebujesz pomocy w zrozumieniu treści tego pisma, przyjdź do punktu obsługi klientów (Customer Service Centre) przy Radzie Miejskiej i poproś o pomoc w języku polskim, albo zadzwoń do Telefonicznego Biura Tłumaczy (Telephone Interpreter Service — TIS) pod numer 131 450 i poproś o skontaktowanie się z Radą Miejską (Council) pod numerem 1300 722 542.	Indonesian Jika Anda memerlukan bantuan untuk memahami surat ini, silakan datang ke Pusat Pelayanan Pelanggan (Customer Service Centre) Pemerintah Kotamadya (Council) dan mintalah untuk bantuan dalam bahasa Anda, atau Anda dapat menghubungi Jasa Juru Bahasa Telepon (Telephone Interpreter Service - TIS) pada nomor 131 450 dan meminta supaya mereka menghubungi Pemerintah Kotamadya pada nomor 1300 722 542.	Turkish Bu mektubu anlamak için yardima ihtiyaciniz varsa, lütfen Belediye'nin Müşteri Hizmetleri Merkezi'ne gelip kendi dilinizde yardım isteyiniz veya 131 450'den Telefonla Tercüme Servisi'ni (TIS) arayarak onlardan 1300 722 542 numaradan Belediye ile ilişkiye geçmelerini isteyiniz.
Hungarian Amennyiben a levél tartalmát nem érti és segítségre van szüksége, kérjük látogassa meg a Tanácsház Ügyfél Szolgálatát (Customer Service Centre), ahol magyar nyelven kaphat felvilágosítást, vagy hívja a Telefon Tolmacs Szolgálatot (TIS) a 131 450 telefonszámon és kérje, hogy kapesolják a Tanácsházat a 1300 722 542 telefonszámon.	Czech Jestliže potřebujete pomoc při porozumění tohoto dopisu, navštivte prosím naše Středisko služeb pro veřejnost (Council's Customer Service Centre) a požádejte o poskytnutí pomoci ve vaší řeči anebo zavolejte Telefonní tlumočnickou službu (TIS) na tel. číslo 131 450 a požádejte je, aby oni zavolali Městský úřad Randwick na tel. číslo 1300 722 542.	Arabic إذا أردت مُساعدة لفهم هذه الرسالة، نرجوك الحضور إلى مركز خدمة عملاء المجلس واطلب المساعدة في لغتك، أو يمكنك الاتصال بخدمة الترجمة الهاتفية (TIS) على هاتف رقم 131 450 واطلب منهم الاتصال بالمجلس على رقم 1300 722 542.
Chinese 如果你需要人幫助你了解這封信的內容，請來市政會顧客服務中心要求翻譯服務，或者與電話傳譯服務（TIS）聯繫，號碼是131 450。請他們幫助你打電話給市政會，號碼是1300 722 542。	Russian Если Вам требуется помощь, чтобы разобраться в этом письме, то, пожалуйста, обратитесь в Муниципальный Центр Обслуживания Клиентов и попросите оказать Вам помощь на Вашем языке или же Вы можете позвонить в Телефонную Службу Переводчиков (TIS) по номеру 131 450 и попросить их связаться с Муниципалитетом по номеру 1300 722 542.	Serbian Ako vam treba pomoć da razumete ovo pismo, molimo vas da dođete do Centra za usluge mušterijama pri Opštini (Customer Service Centre) i zamolite ih da vam pomognu na vašem jeziku, ili možete nazvati Telefonsku prevodilačku službu (TIS) na 131 450 i zamolite ih da vas povežu sa Opštinom na 1300 722 542.

Belinda Kennewell
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure

Uploaded to the Major Projects Portal

EPA's Recommended Secretary's Environmental Assessment Requirements – Vopak Bulk Liquid Fuel Terminal – SSD-111013738

Dear Belinda

I am writing in response to your request for the NSW Environment Protection Authority's (EPA) Secretary's Environmental Assessment Requirements (SEARs) for the Vopak Bulk Liquid Fuel Terminal - SSD-111013738 (Proposal).

The EPA has reviewed the following documents:

- *State Significant Development Scoping Report, 39 Friendship Rd, Port Botany Version 4* prepared by Patch Planning (March 2026).

The EPA understands the proposal is for:

- The construction of a bulk liquid fuel (flammable/ combustible) terminal on the site, with pipeline connections that connect into existing infrastructure at Bulk Liquids Berth 1 and Bulk Liquids Berth 2.
- Installation of two waste storage tanks (approximately 200m³ each).
- Construction of a fully automated truck-loading gantry.
- Construction of transfer pipelines to Site B4 systems.
- Provision of site-wide utilities.

The EPA has considered the details of the proposal and provides the recommended SEARs as **Attachment A**. In carrying out the assessment, the proponent should refer to the relevant guidelines listed, as well as any relevant industry codes of practice and best practice management guidelines.

The Proponent should be made aware that any commitments made in the environmental assessment may be formalised as approval conditions and may also be placed as formal licence conditions. Consistent with Part 9.4 of the Protection of the Environment Operations Act 1997 the EPA may require the provision of a financial assurance and/or assurances. The amount and form of the assurance(s) would be determined by the EPA and required as a condition of the licence.

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

Phone:
131 555

Email:
info@epa.nsw.gov.au

Website:
epa.nsw.gov.au

Visit:
6 Parramatta Square
10 Darcy Street
Parramatta NSW 2150

Mail:
Locked Bag 5022
Parramatta NSW 2124

If you have any questions about this request, please contact Jenny Gustafson via email at environmentprotection.planning@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jackson', with a stylized flourish at the end.

Christie Jackson
Unit Head – Environment Protection Planning
NSW Environment Protection Authority

ATTACHMENT A

NSW EPA's Recommended Secretary's Environmental Assessment Requirements Vopak Bulk Liquid Fuel Terminal – SSD-111013738

1. Environmental impacts of the project

- 1.1. The description should include the following for both the construction and operation of the project:
 - a. Details of the premises covered by the project including any relationship with any existing Environment Protection Licences
 - b. the layout of all the physical elements of the project within the project area, including all buildings, structures, works, haulage activities, pollution controls, stockpile and material handling areas, sealed and unsealed areas, landscaping and open space.
 - c. all mitigation measures that will be built into the physical layout and design of the project (such as noise walls)
 - d. any ancillary infrastructure for which approval is being sought (such as upgrades to utilities or surrounding roads)
 - e. identify those components of the physical layout and design that may change during the detailed design of the project, and set clear limits within which this change may occur without requiring amendments to the DA or modifications to the development consent if the project is approved
 - f. plans showing the layout and design in plan-view and cross section.
- 1.2. Identify any likely interactions between the development and any existing/approved developments and land uses in the area.
- 1.3. Identify all sensitive receivers likely to be affected by the development using clear maps/plans, including key landform areas, such as conservation areas and waterways.
- 1.4. Identify all potential environmental emissions, assess the likely environmental impacts, and describe the proposed mitigation measures to minimise environmental pollution to achieve compliance with relevant environmental legislation, policies, and guidelines.
- 1.5. The EIS must accurately summarise the key findings of the detailed technical studies in the appendices of the EIS and use suitable cross-referencing to reduce repetition between the two parts of the EIS.

2. EPA Licensing and Approval Requirements

- 2.1. Identify all approvals and licences required under environment protection legislation including details of all scheduled activities under schedule 1 of the *Protection of the Environment Operations Act 1997*.
- 2.2. Outline how the proposal and its environmental protection measures would be implemented and managed so as to demonstrate that the proposal is capable of complying with statutory obligations under EPA licences or approvals (e.g. outline of an environmental management plan).

3. Construction Works

- 3.1. The EIS must include detail of the construction works including:
 - a. any earthworks or site clearing; re-use and disposal of cleared material (including use of spoil on-site).
 - b. Identify, characterise and classify the following in accordance with the EPA's *Waste Classification Guidelines (2014)*:

- i. all waste that will be generated onsite through excavation, demolition or construction activities, including proposed quantities of the waste;
- ii. all waste that is to be removed to an offsite location, including proposed quantities. Include the commitment to ensure this waste is taken to a facility that can lawfully receive it.

Note: The EPA's *Waste Classification Guidelines (2014)* are available at: <https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste>

- c. construction timetable and staging; hours of construction; proposed construction methods.
 - d. environment protection measures, including noise mitigation measures - in accordance with the Interim Construction Noise Guideline (DECC, 2009), dust control measures and erosion, and sediment control measures- in accordance with Managing urban stormwater: Soils and construction, vol. 1 (Landcom 2004).
- 3.2. Include a site diagram showing the site layout and location of environmental controls.
- 3.3. Construction noise associated with the proposed development should be assessed using the *Interim Construction Noise Guideline* (DECC, 2009). These are available at: <https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/construction-noise>

4. Air issues

- 4.1. The EIS must demonstrate the proposal's ability to comply with the relevant regulatory framework, specifically the POEO Act and the *Protection of the Environment Operations (Clean Air) Regulation 2022*. This consideration should include section 129 of the POEO Act concerning control of "offensive odour".
- 4.2. The EIS must include an air quality impact assessment (AQIA). The AQIA must be carried out in accordance with the document, *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2022). These are available at: <https://www.epa.nsw.gov.au/your-environment/air/industrial-emissions/approved-methods-for-the-modelling-and-assessment-of-air-pollutants>
- 4.3. The EIS must detail emission control techniques/practices that will be employed at the site and identify how the proposed control techniques/practices will meet the requirements of the POEO Act, *POEO (Clean Air) Regulation* (2022) and criteria within *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2022).

5. Noise and Vibration

The EIS must assess the following noise and vibration aspects of the proposed development:

- 5.1. Operational and construction activities on the premises that maybe considered vibration intensive should be assessed using the guidelines contained in the *Assessing Vibration: a technical guideline* (DEC, 2006). These are available at: <https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/assessing-vibration>
- 5.2. If blasting is required for any reasons during the construction or operational stage of the proposed development, blast impacts should be demonstrated to be capable of complying with the guidelines contained in *Australian and New Zealand Environment Council – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration* (ANZEC, 1990). These are available at: <https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/construction-noise>
- 5.3. Operational noise from noise intensive activities to be undertaken on the premises should be assessed using the guidelines contained in the *NSW Noise Policy for Industry* (EPA, 2017). Available at: [https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-\(2017\)](https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-(2017))

- 5.4. If applicable, noise on public roads from increased road traffic generated by land use developments other than road projects should be assessed using the guidelines contained in the *NSW Road Noise Policy* (EPA, 2011) and associated application notes. Available at: <https://www.epa.nsw.gov.au/your-environment/noise/transport-noise>.
- 5.5. If applicable, noise on rail lines from increased rail traffic generated by land-use developments other than rail projects should be assessed using the guidelines contained in the *Rail Infrastructure Noise Guideline* (EPA, 2013) and associated application notes. Available at: <https://www.epa.nsw.gov.au/your-environment/noise/transport-noise>.

6. Waste, chemicals and hazardous materials and radiation

The EIS must assess the following waste, chemical and hazardous materials related aspects of the proposed development:

- 6.1. Assess and describe all aspects of waste generation, management and disposal associated with the proposed development.
- 6.2. Demonstrate compliance with all regulatory requirements outlined in the POEO Act and associated waste regulations.
- 6.3. Outline contingency plans for any event that may result in environmental harm, such as excessive stockpiling of material, or dirty water volumes exceeding the storage capacity available on-site.
- 6.4. Demonstrate that appropriate spill containment will be provided for storage, filling and loading of all fuels and other chemicals to be used on site, in accordance with all relevant Australian Standards, and/or NSW EPA's *Storing and Handling of Liquids: Environment Protection-Participants Manual* (DECC, 2007).
- 6.5. Demonstrate compliance with Part 9.3E of the POEO Act for the use of any industrial chemicals, including details of activities involving Schedule 6 or Schedule 7 chemicals listed on the IChEMS register. Additionally, demonstrate a system for periodic review to ensure that any new IChEMS Register requirements are incorporated.
- 6.6. Assess and describe any potential risks relating to all known and potential contaminants of concern (CoC) including per- and polyfluoroalkyl substances (PFAS) that may be associated with the proposed development and if applicable, how they will be mitigated. Consideration should be given to potential health and environment related impacts caused by the CoC. The assessment should consider various sources, receptors and exposure pathways including but not limited to ingestion (drinking water and food consumption), inhalation, and dermal contact.
- 6.7. Identify the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the *NSW Waste and Sustainable Materials Strategy 2041 Stage 1: 2021-2027*. Available at: <https://www.epa.nsw.gov.au/Your-environment/Recycling-and-reuse/Strategic-direction-for-waste-in-NSW/Waste-and-Sustainable-Materials-Strategy>.

This facility will be required to report on the amount of waste being handled:

- a. If it is located within or receives waste from the Metropolitan Levy Area (MLA) or Regional Levy Area (RLA), a weighbridge will need to be installed, and it will need to report monthly. If it is located within the Non-Levied Area (NLA), and only receives waste from the NLA, then it will need to report annually.
- b. Document how you will comply with Clause 36 of the *Protection of the Environment (Waste) Regulation 2018*. This Clause includes requirements regarding the installation and calibration of a weighbridge, vehicle flow plans, weighbridge software and associated recording and reporting requirements.

- c. Document how you will comply with the EPA's waste levy benchmark requirements including the software to be used.
- d. Nominate the upper limit of the amount of waste that may be stockpiled at your facility at any one time. This nominated amount will be considered when determining the maximum authorised amount of waste that may be at your facility at any time.
- e. Ensure that the facility complies with the waste levy requirements for the levy area in which it is located. Information about levy areas is available at <https://www.epa.nsw.gov.au/your-environment/waste/waste-levy/levy-regulated-area-and-levy-rates>.

7. Water

The EIS surface water quality assessment must:

- 7.1. Demonstrate that all practical measures to prevent, control, abate or mitigate water pollution have been implemented, including a description of options that were explored (such as reuse to avoid a discharge or treatment).
- 7.2. Provide details of the proposal that are essential for predicting and assessing potential impacts to receiving waters. This could include (but is not limited to):
 - a. Site layout, including details of the existing and proposed water management system.
 - b. Drainage map for the entire site identifying sub-catchments, flow paths, drainage infrastructure, design sizing of structures, water storages, discharge points, and any potential flow paths to receiving waters.
 - c. How stormwater will be managed in all phases of the project. Information should include, where appropriate, measures to avoid or minimise erosion, leachate generation, and sediment mobilisation at the site.
 - d. Any in-water activities (such as piling or dredging).
- 7.3. Include water balance(s) for ground and surface water, including any intake and discharge locations, volumes, frequency and duration.
- 7.4. Identify and estimate the quality and quantity of all pollutants that may be introduced into the water cycle by source and discharge point, including residual discharges after mitigation measures are implemented. This should be undertaken for construction and operational phases.
- 7.5. Include a water pollution impact assessment undertaken consistent with the guidance available at <https://www.epa.nsw.gov.au/your-environment/water/managing-water-pollution-in-nsw/environment-protection-licensing/water-pollution-discharge-assessments>. The level of assessment should be commensurate with the risk to the environment and human health.
- 7.6. Describe any surface water quality monitoring programs, including proposed monitoring locations, frequency and indicators of surface water quality. Analytical limits of reporting should have regard to any identified guideline values. Water quality monitoring should be undertaken in accordance with the *Approved Methods for the Sampling and Analysis of Water Pollutants in NSW* (2004) available at: [Approved methods for the sampling and analysis of water pollutants in NSW | EPA](#)
- 7.7. The EIS must describe how stormwater will be managed in all phases of the project, including details of how stormwater and runoff will be managed to minimise pollution. Information should include measures to be implemented to minimise erosion, leachate and sediment mobilisation at the site. The EIS should consider the guidelines *Managing urban stormwater: soils and construction*, vol. 1 (Landcom 2004) and vol. 2 (A. Installation of services; C. Unsealed roads; D. Main Roads; E. Mines and quarries) (DECC, 2008).

8. Groundwater

- 8.1. Provide details of the project that are essential for predicting and assessing impacts to groundwater with a description of the existing environment, including:
- Geological, topographical, and hydrogeological resource descriptions, maps, and cross-sections.
 - Assessment of groundwater quality, users of groundwater, existing bores including depths and construction, assessment of local land use.
 - A hydrogeological interpretation of water-bearing geological units, depth to water table, groundwater gradient, Conceptual hydrogeological model, assessment of groundwater dependent ecosystems.
 - Site map and cross-sections showing and characterising any proposed excavations and spoil emplacement (relative to water table) with topography.
 - Proposed groundwater monitoring program.
 - Assessment should be in accordance with Groundwater assessment toolbox for major projects in NSW - Overview document (DPE, 2022) - https://water.nsw.gov.au/data/assets/pdf_file/0004/507613/Groundwater-assessment-toolbox-for-major-projects-in-NSW.pdf

9. Soils

- 9.1. The EIS should include an assessment of the potential impacts on soil and land resources should be undertaken, being guided by the *Soil and Landscape Issues in Environmental Impact Assessment* (DLWC 2000). The nature and extent of any significant impacts should be identified. Particular attention should be given to:
- Soil erosion and sediment transport- in accordance with *Managing urban stormwater: Soils and construction, vol. 1* (Landcom 2004) and vol. 2 (A. Installation of services; B Waste landfills; C Unsealed Roads; D Main Roles) (DECC2008).
 - Mass movement (landslides) – in accordance with *Landslide risk management guidelines* presented in *the Australian Geomechanics Society* (2007).
 - Urban and regional salinity – guidance given in the *Local Government Salinity Initiative* booklets which includes *Site Investigation for Urban Salinity* (DLWC, 2002).
- 9.2. A description of the mitigation and management options that will be used to prevent, control, abate or minimise identified soil and land resource impacts associated with the project. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented. Where required, add any specific assessment requirements relevant to the project.

10. Contamination

- 10.1. Identify the likelihood of contamination at the site and surrounding land (on different media such as soils, groundwater, ground gas, surface water and sediments, where applicable) by considering the context of past, current, and proposed land uses. The EIS must document how the assessment of contaminated land has been undertaken with regard to the relevant guidelines for contaminated land made or approved by the NSW EPA.
- 10.2. All reports on contamination must be prepared by a suitably qualified contaminated land consultant⁽¹⁾ who is also certified⁽²⁾.

(1) A suitably qualified and experienced contaminated land consultant is a contaminated land consultant who meets the competencies outlined in the Guideline on the Competencies and Acceptance of Environmental Auditors and Related Professionals (Schedule B9) as provided in the ASC National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended in 2013)."

(2) A certified consultant is a consultant certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme;

Note: If an auditor is being engaged for the project, the requirement for a certified consultant to prepare the contaminated land reports is still recommended as it will help ensure all assessment work is done as efficiently as possible, but it is optional. However, it must still be required for all reports to be prepared by a suitably qualified contaminated land consultant.

- 10.3. Where contamination is considered likely based on past or current land uses or other factors (such as offsite contamination migrating onto the site), undertake detailed site investigation/s to determine the nature and extent of the contamination.
- 10.4. Where contamination exists, assess if remediation of the land is required, having regard to current and future land uses; and the ecological and human health risks posed by the contamination to both onsite and offsite receptors.
- 10.5. Where a detailed site investigation is prepared and/or remediation is considered necessary, a NSW EPA accredited Site Auditor must be engaged to undertake an audit. The EIS must include copies of any Interim Audit Advice provided by the auditor and a Site Audit Statement and Site Audit Reports issued by the auditor which certifies the site can be made suitable for the proposed use
- 10.6. The following references should be included as relevant guidelines that must be followed when assessing contaminated land:
 - a. *Managing Land Contamination: Planning Guidelines SEPP 55 – Remediation of Land (DUAP and EPA, 1998)* - <https://www.epa.nsw.gov.au/sites/default/files/managing-contaminated-land-guidelines-remediation.pdf>
 - b. *Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997 (EPA, 2015)*
 - c. *Contaminated land sampling design guidelines - Part 1 and 2 (EPA, 2022)*
 - d. *Consultants reporting on contaminated land: contaminated land guidelines (EPA, 2020)*
 - e. *Guidelines for the NSW Site Auditor scheme 3rd edition (EPA, 2017)*
 - f. Any other relevant guidelines made or approved by the EPA under s105 of the *Contaminated Land Management Act 1997* - <https://www.epa.nsw.gov.au/your-environment/contaminated-land/statutory-guidelines>

11. Climate Change

- 11.1. The Environmental Impact Statement (EIS) must provide Scope 1 and Scope 2 Greenhouse Gas (GHG) emissions estimates associated with the proposed development. The EIS is to confirm whether the proposal is likely to result in 25,000 tonnes CO₂-e or more of Scope 1 and 2 emissions in any financial year.
- 11.2. If the proposed development will generate less than 25,000 tonnes per annum of CO₂-e in any financial year, then the project is not expected to trigger the assessment requirements under NSW Guide for Large Emitters (Large Emitters Guide).
- 11.3. If the estimated emissions exceed the 25,000 tonnes per annum of CO₂-e threshold in any financial year during the project's operational life, then the EIS must include a GHG assessment prepared in accordance with the Large Emitters Guide. Where the proponent believes that certain requirements from the Large Emitters Guide are not applicable, the proponent may indicate that in the EIS but is to provide sufficient justification.

11.4. The following references should be considered in the EIS (where applicable):

- a) For coal mine projects: Please refer to Greenhouse Gas Mitigation Guide for NSW Coal Mines
- b) For agricultural projects: Please refer to NSW EPA Guide for Large Emitters – information for agricultural proponents and climate change requirements for agricultural licensees (<https://www.epa.nsw.gov.au/Your-environment/Climate-change/climate-change-requirements-licensees/agriculture>)
- c) For landfill projects: Please refer to climate change requirements for landfill licensees (<https://www.epa.nsw.gov.au/Your-environment/Climate-change/climate-change-requirements-licensees/landfill>)

NOTE: The NSW EPA is preparing guidance for the preparation and implementation of various climate change related guidelines, including but not limited to Climate Change Mitigation and Adaptation Plans. The EPA advises that preparation of Climate Change Mitigation and Adaptation Plan (CCMAP) may be required under the EPA's regulatory framework, including conditions in the Environment Protection Licence.

Department of Climate Change, Energy, the
Environment and Water



Our ref: OUT26/3567

Belinda Kennewell
Planning and Assessment Group
NSW Department of Planning, Housing and Infrastructure

Email: Belinda.kennewell@dpie.nsw.gov.au

1 April 2026

Subject: Vopak Bulk Liquid Fuel Terminal (Randwick City) (SSD-111013738)
Comment on the Secretary's Environmental Assessment Requirements (SEARs)

Dear Belinda Kennewell,

The NSW DCCEEW Water Group has developed standard input to SEARs for SSD and SSI projects. Please see **Attachment A** for detailed requirements.

If any of the requirements do not apply to this project, the proponent should describe why in a short statement.

Should you have any further queries in relation to this submission please do not hesitate to contact the Water Assessments team at water.assessments@dcceew.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read "T. Baker".

Tim Baker,
Project Officer, Water Assessments, Planning & Knowledge Division
NSW Department of Climate Change, Energy, the Environment and Water

Water Take and Licensing

No.	Assessment Requirement	Relevant Policy/Guideline/Legislation
1	A detailed and consolidated site water balance.	
2	Description of all works/activities that may intercept, extract, use, divert or receive surface water and/or groundwater. This includes the description of any development, activities or structures that will intercept, interfere with or remove groundwater, both temporary and permanent.	NSW Aquifer Interference Policy (2012), section 3 & 5 of the <i>Water Management Act 2000</i>, Water Sharing Plans Clause 46 of the <i>Water Management (General) Regulation 2025</i> Groundwater Guidelines- Water Library: Browsing the Water Group
3	Details of all water take for the life of the project and post closure where applicable. This is to include water taken directly and indirectly, and the relevant water source where water entitlements are required to account for the water take. If the water is to be taken from an alternative source confirmation should be provided by the supplier that the appropriate volumes can be obtained.	Section 3 & 5 of the <i>Water Management Act 2000</i>, Water Sharing Plans Section 2 of the NSW Aquifer Interference Policy provides explanation of water take for aquifer interference activities
4	Details of Water Access Licences (WALs) held to account for any take of water where required, or demonstration that WALs can be obtained prior to take of water occurring. This should include an assessment of the current market depth where water entitlement is required to be purchased. Any exemptions or exclusions to requiring approvals or licenses under the <i>Water Management Act 2000</i> should be detailed by the proponent.	Water Sharing Plans Sections 3, 5, 60A & 60I of the <i>Water Management Act 2000</i> WAL must nominate a work to satisfy s60D of the <i>Water Management Act 2000</i> and this is completed by a dealing application under s71W of the <i>Water Management Act 2000</i> Exemptions or exclusions information: ○ Schedule 4 <i>Water Management Regulation 2025</i> ○ Sections 4.41 and 5.23 of the <i>EP&A Act 1979</i> ○ Water licensing and works approvals exemptions - Licensing and approvals Water and Groundwater access licence exemptions NSW Government Water

Water Impacts

No.	Assessment Requirement	Relevant Policy/Guideline/Legislation
5	A description of groundwater conditions that provides an understanding of groundwater level across the site under a range of wet and dry conditions.	NSW Aquifer Interference Policy Groundwater Guidelines
6	Assessment of impacts on surface and ground water sources (both quality and quantity), related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, groundwater dependent ecosystems, and ground water levels; including measures proposed to reduce and mitigate these impacts.	<i>Water Management Act 2000</i> Part 1, Division 1, Section 5(2d; 4c) & Part 3 Div 2 Sect 97 <i>Water Management Act 2000</i> Part 1, Division 1, Section 5(4a;5a; 6a; 7a; 8a)) NSW Aquifer Interference Policy Groundwater Guidelines
7	Proposed surface and groundwater monitoring activities and methodologies.	Groundwater Guidelines NSW Water Quality and River Flow Objectives Australian and New Zealand fresh and marine water quality guidelines (ANZG 2018)

Dam Safety

No.	Assessment Requirement	Relevant Policy/Guideline/Legislation Dam Safety NSW - Resources
8	Identify the proposed construction and/or use of a declared dam under Dam Safety Regulations. This is to include existing declared dams with or without physical modifications, new declared dams, modifications to existing dam/s that would require the dam to be declared or the decommissioning of a declared dam.	<i>Dam Safety Act 2015</i> <i>Dam Safety Regulation 2019</i> – Part 2 & 3
9	Describe the consequence category of existing declared dam/s and provide an overview of compliance with the requirements of the Dam Safety Regulation, including (but not limited to) requirements for a dam safety management	<i>Dam Safety Act 2015</i> <i>Dam Safety Regulation 2019</i> – Part 3, 4, 5

	system, operations and maintenance plans, and emergency plans.	
10	Include a written consequence category assessment for any proposal involving a new dam, modifications to an existing declared dam/s that are likely to change its consequence category, or changes to downstream property that are likely to change the consequence category of a declared dam.	<i>Dam Safety Regulation 2019 Part 3</i>
11	Describe the decommissioning process of any existing declared dam.	<i>Dam Safety Act 2015</i> <i>Dam Safety Regulation 2019</i>
12	Describe all mining and mining related activities proposed within a Mining Notification Area and assess the impacts of the proposed activities on any declared dam. This is to include proposed mitigating measures and monitoring programs.	<i>Dam Safety Act 2015 – Section 48</i> NSW Declared Dams Interactive Map MinView

Assessment against Policy and Guidelines

No.	Assessment Requirement	Relevant Policy/Guideline/Legislation
13	Identification and impact assessment of all works/activities located on waterfront land including an assessment against Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2025).	Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2025)
14	Assessment of project against relevant policies and guidelines	Water Sharing Plans, Floodplain Management Plans, NSW Aquifer Interference Policy, Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2025), Groundwater Guidelines



Your ref: SSD-111013738
Our ref: DOC26/179280

Belinda Kennewell
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

10 April 2026

Subject: Request for Secretary's Environmental Assessment Requirements (SEARs) for Vopak Bulk Liquid Fuel Terminal (SSD-111013738) (Randwick City)

Dear Belinda,

Thank you for your email received on 24 March 2026, requesting input on SEARs for the above project from the Conservation Programs, Heritage and Regulation Group (CPHR) and NSW National Parks and Wildlife Service (NPWS) of the NSW Department of Climate Change, Energy, the Environment and Water.

CPHR, in consultation with the NPWS, has reviewed the *State Significant Development Scoping Report 39 Friendship Road, Port Botany* (Patch Planning, March 2026) and recommends the applicant address the requirements below and at **Attachment A**.

Biodiversity assessment requirements

In relation to point 6 of the recommended biodiversity environmental assessment requirements, please note the minimum information and spatial data requirements are in Tables 24 and 25 of the [Biodiversity Assessment Method 2020 \(BAM\)](#). Other requirements, such as those relating to the BAM Calculator and Biodiversity Offset Assessment Management System, are detailed in the [guides, tools and databases](#) webpage.

If you have any enquiries about this advice, please direct them to the Central Metropolitan Planning team mailbox at rog.gsrplanning@environment.nsw.gov.au.

Yours Sincerely,

Marnie Stewart
**A/Senior Team Leader, Central Metropolitan
Conservation Planning and Assessment
Conservation Programs, Heritage and Regulation**

CPHR and NPWS Environmental Assessment Requirements – Vopak Bulk Liquid Fuel Terminal (SSD-111013738) (Randwick City)

Flooding 1. The EIS shall include a flood impact and risk assessment (FIRA) in accordance with the Flood Impact and Risk Assessment: Flood Risk Management Guideline-LU01 (DPE, 30 June 2023). The FIRA is to be undertaken by a suitably qualified engineer with experience in NSW flood risk management and as a minimum should: - Consider the relevant provisions of the NSW Flood Risk Management Manual (DPE, 30 June 2023) and associated guides, and existing council and government studies, information and requirements. - Address the full range of flood behaviour, flood constraints and risk for existing scenario. To achieve this, flood behaviour would be examined for a range of events. Typical events examined may include the 10%, 5%, 1%, 0.5% or 0.2% annual exceedance probability (AEP) and probable maximum flood (PMF). The Intensity Frequency Duration (IFD) for the base case scenario should be in accordance with the best industry practice i.e., Australian rainfall and runoff 2019 version 4.2. - Address the full range of flood behaviour, flood constraints and risk for the post development scenarios. To achieve this, the consultant must incorporate the development components onto the verified models and identify post-development flood characteristics for a range of events. Typical events examined may include the 10%, 5%, 1%, 0.5% or 0.2% AEP and PMF. - Identify the constraints that flood places on the land (floodways, flood storage, flood hazard and emergency response issues) determined for a number of events, typically 5%, 1%, 0.2% or 0.5% AEP and PMF. - Assess the appropriateness of the development or development types for the location based on the flood constraints on the land. - Identify the impacts of the development on flooding for the full range of flood events. - Identify and assess the adequacy of management measures and controls to: - effectively address these constraints to ensure the flood risks to the proposed development and its users are acceptable - manage flood and associated emergency management impacts to the existing community due to the development. - Consider climate change impacts based on the existing advice provided in the Understanding and Managing Flood Risk: Flood Risk Management Guideline-FB01 (DPE, 30 June 2023) as outlined in Section 2.6.
Coastal Management 2. The EIS shall include a coastal management assessment that addresses the following: - Coastal Management Framework - Consideration of relevant provisions under the <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (RH SEPP) and <i>Coastal Management Act, 2016</i>. - Demonstration of consistency with the Cooks River Coastal Management Program and Georges River Coastal Management Program. - Coastal Processes and Hazards - A coastal processes assessment addressing waves, hydrodynamics, sediment transport and shoreline stability. - Assessment of current and future tidal inundation and sea level rise across 0, 20, 60 and 100-year planning horizons.

- Geotechnical investigation to assess slope stability and contaminated groundwater interactions under future climate change scenarios.
- Sensitivity testing or additional geotechnical sampling if sediment properties remain uncertain.
- Estuarine and Marine Ecology
 - Mapping and assessment of *Posidonia australis* and other marine habitats.
 - Assessment of construction and operational impacts on water quality and ecological values.
 - Demonstration of consultation with Gamay Rangers and consideration of the Sea Country values outlined in the [Gamay Sea Country Plan \(March 2025-2035\)](#).

Biodiversity

3. Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the [Biodiversity Conservation Act 2016](#) (BC Act), the Biodiversity Assessment Method 2020 (BAM) and documented in a [Biodiversity Development Assessment Report \(BDAR\)](#). The BDAR must include information in the form detailed in the BC Act (s 6.12), *Biodiversity Conservation Regulation 2017* (s 6.8) and BAM, including an assessment of the impacts of the proposal (including an assessment of impacts prescribed by the regulations).
4. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the BAM.
5. The BDAR must include details of the measures proposed to address the offset obligation as follows:
 - The total number and classes of biodiversity credits required to be retired for the development/project.
 - Any proposal to make a payment to the Biodiversity Conservation Fund.
6. The BDAR must be submitted with all spatial data associated with the survey and assessment as per the BAM.
7. The BDAR must be prepared by a person accredited in accordance with the *Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017* under s 6.10 of the BC Act.

Water and Soils

8. The EIS must map the following features relevant to water and soils including:
 - Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).
 - Rivers, streams, wetlands, estuaries.
 - Wetlands.
 - Groundwater.
 - Groundwater dependent ecosystems.
 - Proposed intake and discharge locations.
9. The EIS must describe background conditions for any water resource likely to be affected by the development, including:
 - Existing surface and groundwater.
 - Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations.
10. The EIS must assess the impact of the development on hydrology, including:
 - Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.
 - Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.

11. Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).

National Parks and Wildlife Estate

12. In the case of a project that is proximate to, is in the vicinity of, or upstream of land reserved or vested in the Minister under the *National Parks and Wildlife Act 1974*, ensure the matters outlined in the *Developments adjacent to National Parks and Wildlife Service lands - Guidelines for consent and planning authorities* (DPIE 2020) (<https://www.environment.nsw.gov.au/research-and-publications/publications-search/developments-adjacent-to-national-parks-and-wildlife-service-lands>) are adequately considered and include:
- recognition of the natural, cultural and social values attached to that land
 - recognition of the impacts, including direct, indirect and cumulative impacts as they relate to the environmental values of that land, its location, and greater landscape connectivity
 - extent of the direct, indirect and cumulative impacts on that land
 - duration of the direct, indirect and cumulative impacts on the interface, the greater environmental values and the reserves connectivity in the landscape to other reserved land.
13. Measures proposed to prevent, control, abate, minimise, manage and offset the impacts including an evaluation of the proposed measures effectiveness and reliability over the life of the project.

End of Submission

2 April 2026

TfNSW Reference: SYD26-00310/01

DPHI Reference: SSD-111013738



Ms. Kiersten Fishburn
Secretary
Department of Planning, Housing, and Infrastructure
PO Box 21
Parramatta NSW 2124

Attention: Belinda Kennewell

**REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS
VOPAK BULK LIQUID FUEL TERMINAL
39 FRIENDSHIP ROAD, PORT BOTANY**

Dear Ms Fishburn,

Thank you for providing Transport for NSW (**TfNSW**) with an opportunity to provide input to the Secretary's Environmental Assessment Requirements (**SEARs**) for the abovementioned State Significant Development (**SSD**).

TfNSW has reviewed the Scoping Report and advises that the agency has no additional requirements beyond the standard Secretary's Environmental Assessment Requirements.

If you have any further inquiries in relation to this matter, please contact Jason Liang, Land Use Planner by email at development.sydney@transport.nsw.gov.au.

Yours sincerely,

Rachel Davis
Senior Land Use Planner Eastern
Transport Planning Branch
Planning, Integration and Passenger



File Ref. No: FRN13/7387-1 BFS26/2072 7000000885
TRIM Doc. No: D26/54370
Contact: Station Officer Richard Jay

1 April 2026

BELINDA KENNEWELL
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Belinda,

Re: Advice on Secretary's Environmental Assessment Requirements (SEARs) – VOPAK BULK LIQUID FUEL TERMINAL - 39 FRIENDSHIP ROAD, PORT BOTANY (SSD-111013738)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 24 March 2026, requesting input into the preparation of the SEARs for THE VOPAK BULK LIQUID FUEL TERMINAL - 39 FRIENDSHIP ROAD, PORT BOTANY (SSD-111013738). FRNSW have reviewed the SEARs along with the Scoping Report with particular focus to Section 7.3 Hazards and Risks.

The Scoping Report details a bulk liquid fuel (flammable/ combustible) terminal. It has been the experience of FRNSW that a facility of this type will present special problems of fighting fire and suitable additional provisions are likely to be required in accordance with E1D17 and E2D21 of the National Construction Code 2022¹.

FRNSW will likely recommend a Fire Safety Study (FSS) be developed in accordance with the Hazardous Industry Planning Advisory Paper No 2² as a condition of consent. The FSS should be used to inform the design and as such it is FRNSW Position³ that the FSS be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ).

The FSS should be prepared consistent with the relevant FRNSW Fire Safety Guidelines and FRNSW Technical Information Sheets⁴ with particular focus to Access for fire brigade vehicles and firefighters⁵.

Project proponents undertaking the FSS are to engage directly with FRNSW by submitting all correspondence electronically to FireSafety@fire.nsw.gov.au and reference FRNSW file number FRN13/7387-1. Further information regarding FRNSW Meetings⁶ and FRNSW Written Reports⁷ can be found at the FRNSW Building Fire Safety Industry Portal⁸.

Yours sincerely,



Station Officer Courtney Goodhew
A/Team Leader
Fire Safety Liaison Unit

Cc: belinda.kennewell@dpie.nsw.gov.au

¹ <https://ncc.abcba.gov.au/editions/ncc-2022>

² <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hazardous-and-offensive-planning-advisory-paper-no-2-fire-safety-study-guidelines.pdf>

³ <https://www.fire.nsw.gov.au/page.php?id=9447&position=51>

⁴ <https://www.fire.nsw.gov.au/page.php?id=9166>

⁵ https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_access_for_emergency_vehicles.pdf

⁶ <https://www.fire.nsw.gov.au/page.php?id=9193>

⁷ <https://www.fire.nsw.gov.au/page.php?id=9156>

⁸ <https://www.fire.nsw.gov.au/page.php?id=9140>