

Rasmus Altenkamp

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Industry Assessments

Department of Planning, Housing and Infrastructure

Via email rasmus.altenkamp@dpie.nsw.gov.au

Re: Kurnell Terminal SSD-5544 MOD 7

The document titled "**Kurnell Terminal SSD-5544 MOD 7 Appendix F Preliminary Hazard Analysis**" (R4Risk Ref. 222-04, Release 6, dated 13 May 2025) addresses risks associated specifically with **Modification 7 to SSD-5544**. While it provides a detailed assessment of the proposed modification, it is limited in scope and does not consider cumulative or future risks associated with the broader development of the site.

Ampol Australia Petroleum Pty Ltd is progressing the development through a series of small, incremental modifications. This approach risks deferring the assessment of cumulative hazards – particularly those arising from future tenants or new industries on the site – until the final stages of development. This creates a significant challenge for regulators, including the Department of Planning, who may be placed in a difficult position when final approvals are sought for new industrial operations.

Specifically, **the potential for new industry on site to pose risks to the existing terminal, and for the existing terminal to pose risks to the new industry, has not been assessed**. In particular, there is a risk that the new industry may come within the direct consequence circle of a major incident occurring at the terminal, and vice versa. The Department of Planning is requested to consider this issue and seek clarity from Ampol on how cumulative and future risks – arising from both existing and proposed operations – will be addressed.

In addition, the Department should include a condition of consent requiring Ampol to submit evidence demonstrating how it has implemented the recommendations outlined in **Section 1.1 (Recommendations)** of the above-mentioned Preliminary Hazard Analysis. This document forms part of the Modification Report for **State Significant Development Application SSD-5544 MOD 7**.

The submission should detail actions taken to address each of the six recommendations listed in Section 1.1, including but not limited to firewater system design, emergency response documentation updates, and fire safety infrastructure adequacy.

It is also noted that **SafeWork NSW previously provided comments dated [17 June 2025]** regarding the broader project and future occupancy of the developed land. These comments remain valid and have not been addressed by Ampol. No response from Ampol is visible on the NSW Planning Portal, and the concerns raised by SafeWork NSW do not appear to have been uploaded on portal.

The Department is urged to ensure that these outstanding matters are addressed transparently

and comprehensively before further modifications are approved.

If you have any questions regarding this, please contact Dr Harit Jani on (02) 8867 2842 or email harit.jani@safework.nsw.gov.au

Yours sincerely



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