

Security Classification:UNCLASSIFIED

Hi Ashley,

Regarding your email dated 25 May to Andrew Battye requesting SEARS for the above proposal, I have set out below the matters that need to be included/addressed in the EIS/PHA.

1. Details of how compliance with the requirements of the Work Health and Safety (WHS) Act 2011 and Regulation 2011 will be achieved.
2. In particular, Chapter 9 (Major hazard Facilities) of the WHS Regulation, how the risks related to hazards and safety will be minimised to So Far As Is Reasonably Practicable (SFARP or ALARP) (see section 17 of the WHS Act 2011).
3. A clear statement on the risk criteria that will be adopted for the proposal and the basis/justification for adopting such criteria. – Reference to relevant publications by the UK health and safety executive (HSE) and the Australian National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) is recommended.
4. An outline of how the requirement to prepare and submit a Safety Case to WorkCover with the MHF licence application will be achieved.
5. When preparing the PHA, the proponent is advised to identify the possible major incidents and the risk reduction measures to be included.
6. The PHA should evaluate both on site and off site risks on a cumulative whole of site basis.
7. Details of the risk reduction measures that will be included to achieve SFAIRP.
8. An outline of how the recommendations made by the UK HSE and other bodies in relation to the Buncefield fuel storage depot fire and explosion in 2005 will be addressed for the proposal.
9. Details of the standards and codes used in the construction of the tanks, the protection systems for the tanks and spill control systems for the tanks. E.g. API standard 2350.
10. The PHA should include an assumptions register with source/justification for the assumptions made in the risk analysis.

Should further information be required, the proponent may contact the undersigned.

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