
Re: Submission on Port Botany Quayline Equalisation EIS

22 October 2025

State significant Infrastructure (SSI-79878464)

Attn: Ports Authority NSW,

Thank you for providing Transport for NSW (Transport) with the opportunity to review and comment on the Environmental Impact Statement (EIS) for the Port Botany Quayline Equalisation (PBQE) proposal.

The Planning and Assessment team identified that the proposal may have potential impact with the operational phase of the Kamay Ferry Wharves project (SSI-10049) and the project team has provided the following comments:

- The Kamay Ferry Wharves project (SSI-10049) completed construction and was opened to the public in February 2025. The project is now in operational phase (Stage 1 – Wharf operation).
- The Kamay Ferry Wharves project has a 10-year Marine Biodiversity Offset Strategy (MBOS) which commenced in 2023 and implementation is ongoing through to 2033.
- Project information including the MBOS is published on the [project website](#).
- The MBOS includes a 10-year seagrass rehabilitation program in Botany Bay and ongoing monitoring and reporting through to 2033.
- The MBOS also includes establishment of 60 new seahorse hotels in Botany Bay to provide artificial habitat for planned release of endangered captive-bred Whites Seahorse (*Hippocampus whitei*) in 2026 and associated 5-year monitoring program.
- The PBQE EIS construction program appears to overlap with the MBOS plan implementation. The PBQE EIS Marine Ecology assessment (Appendix F) and cumulative impact assessment (EIS Section 18) identifies Kamay Ferry Wharves project though consideration is limited to construction phase. We request that the scope of the EIS assessment is expanded to also consider the Operational phase, particularly with regard to the Kamay Ferry Wharves MBOS.
- The PBQE proposal has potential to contribute to both direct and indirect impacts to the successful outcomes of the MBOS implementation. This includes potential impact to the successful implementation of seagrass rehabilitation and associated scientific research projects, seahorse hotel biofouling success, and seahorse release plan.
- Transport is working in close partnership with UNSW and Sydney Institute of Marine Science (SIMS) to implement the Kamay Ferry Wharves MBOS and would like to ensure that the design of the associated research and monitoring projects for the MBOS plans are not impacted. To assist in this regard, and to assist in identification and assessment of potential cumulative impacts, Transport requests that:

- The boundary of the dredging assessment study be expanded to include a wider scope of Botany Bay including Kurnell seagrass restoration area and Inscription Point, and La Perouse Frenchmans Bay and Congwong Bay. The assessment also considers seasonal timing and duration of impact which can also impact seagrass health and seahorse hotel biofouling success.
- The Marine Biodiversity impact assessment (Appendix F) should include consideration of direct and indirect impacts of the sedimentation from dredging to consider impact to seagrass restoration works and seahorse hotel biofouling as part of the MBOS.
- As a condition of approval of the wharves project, Transport provided a bank guarantee to DPIRD Fisheries which remains valid for the life of the MBOS which is contingent on meeting agreed success criteria for the marine biodiversity offset strategy (MBOS). We request that the EIS assessment ensure that the PBQE proposal will not negatively affect the ability for Transport to achieve the required success metrics so as not to not risk the bank guarantee.
- Detailed comments for the Marine Biodiversity impact assessment (Appendix F), Assessment of Significance (Annexure A) include:

Extract	Transport comment
"The precise number of affected White's seahorses, although likely to be small, is uncertain."	White's Seahorse populations in Botany Bay are likely to be small, thus any impact on the species can be considered significant regardless of whether the number is seemingly "small".
"Given the installation of additional pile habitat and following implementation of mitigation measures (see (a)), it is unlikely that the Project would reduce the area of occupancy of the species."	The piles only become suitable habitat after extensive fouling and accumulation of habitat-forming organisms, which is acknowledged by the authors previously, the installation of new piles should not be considered "additional pile habitat" but only the reduction in original habitat. This is acknowledged several times.
"(d) Adversely affect habitat critical to the survival of a species. The Project would result in the direct removal of 88 piles and 240 m of seawall which is considered potential White's seahorse habitat. Given the availability of optimal seahorse habitat elsewhere in Botany Bay, such as extensive seagrass beds in the southern half of the Botany Bay where the species has previously been recorded, artificial habitats within the Study Area are not considered critical to the survival of the species. It is, therefore, unlikely that the Project would adversely affect habitat critical to the survival of White's seahorses."	Please expand to consider the potential disturbances of seagrasses, a critical habitat for the seahorses, in the east of the study area where excess turbidity is expected. Prolonged turbidity may be detrimental to the seagrass being a photosynthetic plant. The seahorses have small home ranges and limited capacity for movement, therefore the reduction of the seagrasses in the east of the study area may significantly impact a seahorse population which is known to be present. Suggesting there is other habitat in Botany Bay that is suitable is not sufficient, in that the presence of habitat which is too far for the seahorses to migrate to, should not give permission for possible degradation of habitat in the study area.
(f) Modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline The Project would result in the direct removal of 88 piles and 240 m of seawall which is considered potential White's seahorse habitat. Given the installation of additional pile habitat as a part of the Project, it is unlikely that the	Please expand to consider potential seagrass loss in east of study area, which is critical seahorse habitat.

Project would modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline.”	
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Transport welcomes the opportunity to coordinate a meeting to discuss further.

Should you require further detail on the matters raised in this letter, please do not hesitate to contact Hannah Deau, Senior Environment and Sustainability Officer at Hannah.Deau@transport.nsw.gov.au.

Sincerely,



Tanya Coates
Director Environmental Planning and Integration
Transport for NSW