



16 December 2022

Mr Keith Ng
Senior Planning Officer
Department of Planning and Environment
NSW Government

Submitted via Planning Portal

Dear Mr Ng

Thank you for considering our submission to the Environmental Impact Study (EIS) exhibition process for Parramatta Light Rail – Stage 2.

Viva Energy Australia Pty Ltd (Viva Energy) is one of Australia's leading liquid fuels suppliers, delivering approximately 40 percent of New South Wales' fuel requirements facilitated by our Gore Bay, Clyde and Parramatta terminals and major pipeline infrastructure.

Viva Energy acknowledges the importance of the Parramatta Light Rail (PLR) as a major catalyst for growth in the Greater Parramatta and Olympic Peninsula (GPOP) corridor. We have previously expressed our support of the NSW Government's vision for the corridor, in particular proposals to activate the Camellia precinct. We are committed to working cooperatively with the NSW Government to achieve an optimal planning outcome for all involved, however, it is essential that future growth and development within this region is achieved without encroachment upon Viva Energy's operational assets.

Viva Energy operates registered Critical Infrastructure Assets pursuant to the Commonwealth *Security of Critical Infrastructure Act* 2018, including our pipelines which are managed in accordance with Australian Standard 2885 to ensure utmost safety and efficiency. We routinely work with government, landowners, developers and community stakeholders to address safety and security issues associated with carrying out developments or changes in land use, to ensure the pipelines do not present unacceptable public safety or environmental risks. We would welcome an opportunity to provide further information on the relevant regulatory requirements for those proposing to work around our assets.

Pipelines are the safest way to transport oil and refined products on land. In NSW, our Gore Bay pipeline connects Gore Bay Terminal to Clyde Terminal, and ultimately facilitates delivery of finished fuel grades to our customers. Pipelines operate at high pressure and should damage inadvertently occur to the pipeline it may result in potentially hazardous situations which ultimately could threaten life and property, and potentially impact the environment.

We have experienced positive engagement with the NSW Government throughout the PLR project process, and our Pipeline Operations team have been grateful for the continued dialogue with TfNSW.

We would like to reiterate that based on the information and inputs provided to us to date, Viva Energy does not oppose the proposed works outright. However, we continue to hold significant concerns about potential impacts on Viva Energy's assets from the PLR2 project in a number of locations. We strongly encourage early and in-depth dialogue about these particular locations in order to achieve the optimal, and safest, outcome for both the integrity of the pipeline and for the PLR project.

Viva Energy Australia Pty Ltd – ABN 46 004 610 459

Thank you again for the opportunity to provide feedback on the EIS. Should you have any questions regarding the content of our submission, and for ongoing engagement on PLR2, please contact Gavin Barnes, Operations Manager – NSW Port Facilities and Pipelines or Sally-Anne Curtain, Government Relations Advisor. We look forward to continued engagement on these matters.

Yours sincerely

Julie Seymour
NSW Operations Manager
Viva Energy Australia