

23 September 2025

To the NSW Department of Planning, Housing and Infrastructure,

This letter is regarding IXOM's State Significant Development (SSD) Modification Application [**Application Number DA35/98-Mod-6: MOD 6 Chlorine Liquefaction Plant**] to construct and operate a new chlorine liquefaction and packaging plant at its chlor alkali facility in Botany, NSW. Gaseous chlorine is the primary chemical used by Australian water utilities for water sanitisation.

The Water Services Association of Australia (WSAA) is leading a sector-wide effort, under the approval of the ACCC, to improve the resilience of the chlorine gas supply chain. The current reliance on a single bottling plant in Australia presents a sovereign risk, due to a reliance on international supplies as a backup in the event of a major disruption.

In 2020, the Australian Government released its *Sovereign Manufacturing Capability Plan* which, amongst other things, identified a need to improve Australia's supply chain resilience for certain critical products. Water treatment chemicals, and specifically chlorine gas, was identified as a critical product category. The Australian Government's *Future Made in Australia* initiative's 'Economic Security and Resilience' stream also supports sectors vital to Australia's national interest but prone to supply chain disruptions by providing support to attract private investment in these critical areas.

IXOM's Laverton facility in Victoria is currently the sole packaging facility for liquefied chlorine gas in Australia. Although IXOM's Botany facility in NSW also manufactures chlorine, it is used in the production of other chlorine-based products and no chlorine gas is produced as a finished product.

IXOM's proposed Botany plant expansion to add the capability to produce bulk and packaged liquefied chlorine gas would provide Australian utilities with an option for a second source of supply and thereby increase the sovereign supply chain resilience of this critical product. The project will achieve this by:

- Providing a contingency source capable of supplying 100% of the Australian bulk and packaged liquefied chlorine gas market at short notice, in the event of a catastrophic failure of the IXOM Laverton plant; and,
- Removing the need for water utilities to rely on imports as a supply contingency for chlorine gas, therefore mitigating risk arising from international shipping disruptions, international chlorine production levels and/or Australia's access to international supply chains.

For the reasons outlined above, IXOM's development application to construct and operate a new chlorine liquefaction and packaging plant at its facility in Botany, NSW aligns with the

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WATER SERVICES
ASSOCIATION OF AUSTRALIA

goals of improving supply security and avoiding sovereign risk in the event of a domestic supply disruption to gaseous chlorine.

Yours Faithfully,

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