

Our Ref: C19/696

11 December 2019

Rose-Anne Hawkeswood Senior Environmental Assessment Officer Energy & Resources NSW Department of Planning, Industry and Environment

Rose-Anne.Hawkeswood@planning.nsw.gov.au

Dear Ms Hawkeswood,

RE: Port Kembla Gas Terminal Modification (SSI 9471 MOD 1)

I refer to your email of 28 November 2019 to NSW Department of Primary Industries (DPI) – Fisheries in respect to the above matter.

This modification proposes to double the number of vessels utilising this gas terminal facility each year. This will result in a far greater volume and frequency of water intake into the system from April to September.

DPI Fisheries provides the following comment for consideration in assessment of the proposal.

DPI Fisheries is concerned that this environmental assessment process to date has not directly addressed potential impacts to marine biodiversity and fish stocks from the uptake of aquatic organisms and plankton into the water inlet structure to the gas terminal. While the Conditions of Approval for the original proposal includes a measure to 'design and construct the water intake on the FSRV to minimise the entrainment of aquatic organisms and plankton', the project still has some uncertainties as to the potential scale of such an impact and how it can be mitigated.

DPI Fisheries seeks to ensure that water intake systems are designed to minimise the entrainment of aquatic organisms and plankton. The Department actively conducts research in this area on inland systems and has been involved in the design of intake systems to minimise such impacts in marine environments, such as that used on the Kurnell Desalination Plant. In both of these situations managing the approach velocity to the water intake, to speeds no greater than 0.1m/sec, are recommended to minimise entrainment of aquatic organisms.

Recommendations

Given the uncertainty around this potential impact, and that this modification significantly intensifies the potential for this impact over the winter months DPI Fisheries recommends that:

- 1. An assessment of the potential for entrainment of aquatic organisms and plankton in the water intake system is conducted prior to any authorisation of this project amendment. This is to include information on the potential scale of impact, proposed measures to mitigate such impact and the approach velocity close to the intake screen; and
- 2. DPI Fisheries be consulted to review the plans of the water inlet structure during the detailed design stage.

Note that as part of the Operational Environmental Management Plan, DPI Fisheries may request some monitoring of the intake system to verify its success in minimising entrainment and see whether any further design mitigation measures may be required to reduce impact.

If you require any further information, please contact me on 4222 8342.



Yours sincerely,

Carla Ganassin

Senior Fisheries Manager, Coastal Systems