



# Department of Industry

OUT18/17822

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Dear Ms Hawkeswood

## **Port Kembla Gas Terminal (CSSI 9471) EIS Exhibition**

I refer to your email of 13 November 2018 to the Department of Industry (DoI) in respect to the above matter. Comment has been sought from relevant branches of Lands & Water and Department of Primary Industries.

The department provides the following comments and recommendations for consideration in assessment of the proposal.

### **DPI Fisheries**

#### **Impacts to fishing activity**

- An assessment of the impact of the proposed works on fishing activities should be conducted.

#### **Discharge of sodium hypochlorite**

- DPI Fisheries strongly recommends that any discharge of sodium hypochlorite into the harbour from the proposed Marine Growth Prevention System and associated mitigation measures are endorsed by the NSW EPA, according to local criteria.
- The EIS states that the sodium hypochlorite profile of discharge water can be changed by modifying the frequency of production and the concentration of sodium hypochlorite. DPI Fisheries requires some clarification as to how such measures will be achieved in a fully operational environment and whether there are any other potential mitigation options to reduce the concentration of sodium hypochlorite in discharge water.
- This ongoing, operational source of pollution and associated potential by-products, if poorly managed, poses potential impacts on marine organisms. It is recommended that the area of potential impact be reduced as far as possible. There should be no impact to the waters outside of the port.
- The Water Quality Management Plan and the Operational Environmental Management Plan should include a clear monitoring program of the discharge and clearly identify ongoing mitigation measures.

#### **Dredging and spoil disposal**

- DPI Fisheries requests the following additional information so that potential impacts from dredging and reclamation activity can be fully considered:
  - Information on the staging of the dredging and disposal activity. It is important that bunds are created around the disposal site prior to the deposition of any contaminated material and that dredging of any potential acid sulfate soils (PASS) containing spoil is appropriately managed and sequenced.

- More detail is required on the composition and design of the proposed bunds and how contaminated sediments will be contained within the outer harbour disposal area over the long term. What measures will be employed to ensure the bunding material is not contaminated? Will the structures be built to withstand strong wave conditions?
- Information on the length of silt curtains and how they will be configured and used around dredging and deposition activities, this needs to include consideration of how barges will operate around the silt curtains.
  - An assessment of how contaminated material and leachate would be contained in any short- and long- term disposal of contaminated spoil east of the gas terminal.
- The existence of contaminated sediment throughout Port Kembla harbour should not be used as a justification for poor dredging practice. Best practice containment of contaminated fines should aim to reduce impacts on sessile and mobile aquatic organisms.
  - The Dredge Management Plan should include some clear triggers relating to water quality, contaminant levels and turbidity, and should clearly outline measures to modify dredging operations should such triggers be reached. There should be no impact to waters outside of the port from the dredging activities and impacts within the Outer Harbour should be minimised as far as possible. It is important that the resuspension of contaminants is minimised.
  - It is unclear why it is proposed to deposit dredged spoil in a slightly different configuration to that approved for the Outer Harbour development. DPI Fisheries seeks clarification as to whether there is any approval for this amended footprint and if there is any intention to reconfigure the disposed sediment at a later date. To reduce environmental risks over time, DPI Fisheries recommends that there is no future re-working of the sediment disposed within the Outer Harbour.

#### Management Plans

- DPI Fisheries requests the opportunity to provide comment on the following drafted plans for this proposal prior to their implementation: Construction Environmental Management Plan (CEMP); Operational Environmental Management Plan (OEMP); Dredging Management Plan; Water Quality Monitoring Plan; Erosion and Sediment Control Plan and Acid Sulphate Soil Management Plan.

Any further referrals to Department of Industry can be sent by email to [landuse.enquiries@dpi.nsw.gov.au](mailto:landuse.enquiries@dpi.nsw.gov.au).

Yours sincerely



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