



Our ref: DOC21/498855-3

Your ref: SSD 10447

Deana Burn

Industry Assessments
Department of Planning, Industry and Environment
Deana.Burn@planning.nsw.gov.au

Dear Ms Burn

Tomago Resource Recovery Facility and Truck Depot (SSD 10447) – Response to submissions

I refer to your request for advice on the major projects planning portal, received 17 June 2021 in which the Planning and Assessment Division (P&A) of the Department of Planning, Industry and Environment (the Department) requested Biodiversity and Conservation Division's (BCD) advice in relation to the Tomago Resource Recovery Facility and Truck Depot project (SSD 10447).

Biodiversity and Conservation Division (BCD) has reviewed the response to submissions report and updated Biodiversity Development Assessment Report (BDAR) and is satisfied that BCD's biodiversity recommendations have been adequately addressed.

BCD's recommendations for flood risk assessment are provided in **Attachment A** and detailed comments are provided in **Attachment B**. If you require any further information regarding this matter, please contact Jayme Lennon, Senior Conservation Planning Officer, on 9585 6935 or via email at huntercentralcoast@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Joe Thompson'.

Joe Thompson
Director Hunter Central Coast Branch
Biodiversity and Conservation Division

Date: 30/6/21

Enclosure: Attachments A and B

BCD's recommendations

Tomago Resource Recovery Facility and Truck Depot

1. BCD recommends that the EMP is revised to:
 1. Provide clear triggers for flood actions
 2. Include actions to reduce risks to people.

BCD's detailed comments

Tomago Resource Recovery Facility and Truck Depot

Flooding and flood risk

1. The Emergency Management Plan does not contain sufficient technical detail to effectively manage flood risk

BCD previously raised concerns of how the risks of storing hazardous materials on the floodplain would be managed. The proponent has revised its Emergency Management Plan (EMP) to include lifting hazardous materials above the Probable Maximum Flood (PMF) level during a flood event.

BCD has reviewed the revised EMP and makes the following comments in regard to the plans effectiveness in providing clear guidelines and actions for managing the flood risk.

- Clear triggers: The EMP trigger for flood risk mitigation actions is when the Chief Warden determines that flood waters may reach the site boundaries. However, it is likely that flood preparedness will be a low priority for the Chief Warden, or they may not have the skills to predict flood levels on the site. The EMP should provide clearer triggers for required flood actions, such as flood heights at a local gauge or receiving flood warnings from the Bureau of Meteorology.
- Risks to People: The site is a low flood island that becomes isolated in rare flood events. The EMP should document actions required to maintain the personal safety of the occupants of the facilities, such as when to evacuate and instructions not to enter floodwaters.
- Description of the flood risk: The EMP should include a description of the site's flood risks, including identification of evacuation routes, and estimation of the likely warning time available to secure hazardous goods and evacuate occupants.
- Recognise the NSW State Emergency Service (SES): The SES should be added to the emergency contact list.

The EMP must also recognise that the NSW SES is the lead combat agency for floods and state that any flood response directive issued by the SES must be followed. This includes any order to evacuate the site or not evacuate the site, irrespective of what decisions have been made by management in accordance with the plan.

The EMP should identify and ensure consistency with the relevant SES local flood plan.

Recommendation 1

BCD recommend that the EMP is revised to:

1. provide clear triggers for flood actions
2. include actions to reduce risks to people.