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The Team Leader
 Industry Assessments
 Department of Planning, Industry and Environment
 4 Parramatta Square, 12 Darcy Street
 PARRAMATTA NSW 2150

Dear Sir

**RE: RESPONSE TO REQUEST FOR FURTHER INFORMATION
 SHOALHAVEN STARCHES EXPANSION PROJECT MP06_0228-Mod-21**

I refer to the Department's letter dated 30th September 2021 seeking further information in relation to the above Modification Application. This submission has been prepared in response to this request.

General

- 1. The Statement of Environmental Effects (SEE) does not stipulate the predicted employment generation of the proposed modification. The Department requests further information on expected operational and construction employment numbers generated from the proposed modification.*

Response

This information was inputted as part of the Modification Application submission through the NSW Major Projects Portal.

The anticipated employment numbers generated by this proposal are as follows:

- There would be no change in operational staff numbers as result of this Modification Application.
 - It is anticipated that the project will generate 10 construction jobs.
- 2. The SEE does not provide the capital investment value (CIV) of the proposed modification works. The Department requests an approximate CIV of the proposed modification works be provided.*

Response

This information was also inputted as part of the Modification Application submission through the NSW Major Projects Portal. The Capital Investment Value of this project is \$9,000,000.00.

Modification Description

3. *Section 5.3 of the SEE identifies current foaming and capacity issues with existing fermenters requiring an additional two fermenters to be proposed to accommodate fermentation capacity. The Department requires further information to elaborate on the foaming overflow issues encountered by the existing fermenters and if the proposed additional fermenters are anticipated to encounter the same overflowing issues.*

Response

Shoalhaven Starches advise that one of the components in wheat that will increase foaming is soluble protein. It is likely that the current foaming issue is the higher soluble protein levels in the fermentation liquour causing increased foaming. Soluble protein levels in the wheat will vary from season to season based on climatic factors and farming practices. The foaming and potential overflow issues arising within the fermenters can be compensated by reducing the fermenter levels within the individual fermenters which reduces their fermentation capacity and ethanol production.

4. *Furthermore, the Department seeks clarification on if the issues are temporary in nature and if the proposed additional fermenters would be made redundant long-term if foaming issues are rectified in the fermentation process. If the foaming issues are temporary in nature, the Department requests further information on any consideration of alternative measures undertaken to either resolve or mitigate the issue.*

Response

Based on the response outlined in item 3 above, Shoalhaven Starches advise it is likely the foaming issues will be a long-term phenomenon and therefore additional fermenter capacity is required. The foaming issues have been mitigated by significantly increasing the anti-foam dosing in the fermenters and by reducing the fill level of the fermenters which reduces their fermentation capacity and ethanol production

I trust that the above information is of assistance to the Department's consideration of this Modification Application. If you require any further clarification or information in relation to this matter please do not hesitate to contact me.

Yours faithfully



Stephen Richardson
COWMAN STODDART PTY LTD