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WorkCover Assistance Service 13 10 50 workcover.nsw.gov.au

Date:29 October 2012 Our Ref: 10258/2012/007507 Your Ref:SSD-4986

Mr Nick Hall Senior Planner, Major Projects Assessment NSW Department of Planning & Infrastructure GPO Box 39 Sydney NSW 2001

Dear Mr Hall

Incitec Pivot Ltd, AN Manufacturing Facility, Kooragang Island (SSD-4986)

Thank you for your letter dated 10 September 2012, inviting WorkCover's submission on the project, including advice on recommended conditions of approval.

While some comments made by WorkCover in November 2011 in relation to the assumptions register have been addressed in the EA, others do not appear to have been adequately addressed.

However, given that the project has now been postponed by 2 years and detailed design of the plant and control systems relevant to risk reduction have not commenced, WorkCover considers that IPL could be required, through the suggested conditions of approval, to consult with WorkCover to address WorkCover's concerns at the time. Therefore WorkCover considers that there are no significant matters to preclude approval provided the suggested conditions of approval set out below are included.

Should the Department determine to approve the proposal, the suggested conditions of approval are:

- At the time of commencement of detailed design, the proponent must consult with the Major Hazard Facilities Unit of WorkCover, and address any matters raised, to the satisfaction of WorkCover.
- Not less than six months prior to commencement of construction, the proponent must consult with the Major Hazard Facilities Unit of WorkCover and prepare a program, to the satisfaction of WorkCover, for updating the Safety Case to incorporate the changes associated with the proposal.

Should you have any queries, please contact me on telephone (02) 8281 6485 or email sohan.fernando@workcover.nsw.gov.au.

Yours sincerely

Sohan Fernando Senior Safety Analyst

Major Hazards Facilities Unit

WorkCover Authority of NSW