



Major Projects
Sydney Gateway Road Project
Tony Sheridan
NSW Government

By electronic submission and
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Dear Tony,

Thank you for the opportunity to comment on the Sydney Gateway Environmental Impact Statement (EIS) and draft Major Development Plan (MDP).

Viva Energy Australia Pty Ltd (Viva Energy) owns and operates a number of pipelines in New South Wales that are used for the movement of refined petroleum products in and around the greater Sydney area. One of these pipelines is the Mascot pipeline which conveys jet fuel across Sydney from our Clyde Terminal, located on the Camellia Peninsula to the Sydney Airport Joint User Hydrant Installation (JUHI) fuel storage facility, located at Mascot. It is this pipeline that is the focus of this submission as it travels through the Sydney Gateway Project area.

The Mascot pipeline operates 24 hours per day, 365 days per year and is part of the critical infrastructure that currently supplies almost 50% of Sydney Airport's fuel needs. The operating pressure of the pipeline can be as high as 9050 kPa. The carrying of hazardous liquids through pipelines at high pressure is an activity that requires careful management to ensure the safety of the community and the protection of the environment.

Pipelines Act & Regulations / WHS Regulations

All works associated with licensed pipelines in NSW is regulated by the Pipelines Act 1967 (the Pipelines Act) and Pipelines Regulations 2013 (the Regulations). The Pipelines Act and Regulations require all pipelines to be operated and maintained in accordance with Australian Standard 2885 Pipelines – Gas and Liquid Petroleum. The Viva Energy Mascot Pipeline operates under licence No. 4 (Clyde to Mascot Pipeline). It should be noted that in the same easement is the Botany Bay to Clyde pipeline operating under licence No. 5.

The Pipelines Act contains a number of restrictions on building/construction activities on land adjacent to pipelines, digging near pipelines and does not allow the obstruction of pipeline operations. These restrictions are appropriate given that damage to the Mascot Pipeline could cause a potentially serious incident (such as a fire, explosion or fuel spill) which would also impact Sydney Airport's fuel supply.

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In addition, the Work Health & Safety Regulation 2011, Division 9 part 389 (2) states: “The owner of a pipeline used to transfer hazardous chemicals must ensure, so far as reasonably practicable, that an activity, structure, equipment or substance that is not part of the pipeline does not affect the hazardous chemicals or the pipeline in a way that increases risk.”

Engineering Design – Proposed Treatment

Viva Energy was not included as a stakeholder in the early stage of the project planning. We are now engaging with the Roads and Maritime Services project team to ensure that through engineering design the project does not have any potential to adversely impact on the integrity of the pipeline and that access to the pipeline for ongoing asset integrity inspections, preventative maintenance and emergency management is maintained.

Within chapter 8 of the EIS, it is noted that the Viva Energy pipelines proposed treatment is to retain and protect. To date there has been no engineering design completed or presented to Viva Energy to consider, and accordingly Viva Energy would like to reiterate that the proposed treatment is only indicative and was proposed by RMS without involvement by Viva Energy. As a result, it is likely the construction footprint, time line and costs involved as described in the EIS will require review and amendment.

Should you wish to further discuss, please do not hesitate to contact me directly on 03 88233751 or at linda.busbridge@vivaenergy.com.au

Sincerely



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