



Department of
**Primary Industries and
Regional Development**

Reference: Subsea7 Learmonth

Mr Ewan Austin
Project engineer
Subsea 7
Ewan.Austin@Subsea7.com

Date: 31 January 2019

Dear Ewan,

With regards to the Subsea 7 Australia Contracting Pty Ltd. (Subsea 7) proposal to build and operate a new pipeline Bundle fabrication facility at Heron Point near Learmonth (Exmouth) in Western Australia.

The Department of Primary Industries and Regional Development (the Department) is the agency responsible for Aquatic Biosecurity in Western Australia. Exmouth Gulf has great environmental value, and is home to numerous important commercial fisheries such as the Exmouth Prawn Fishery and important shellfish fisheries such as scallops and native oysters, as such maintaining good biosecurity measures in this environment is of paramount importance.

Condition 31 of the Learmonth Environmental Scoping Document (ESD) required that Subsea 7:

“Conduct a risk assessment to identify whether the proposed activities are likely to introduce or extend the range of introduced marine pests or pathogens. Identify the control measures by which these may be avoided/mitigated. Based on the outcomes of the risk assessment determine in consultation with EPA Services and the Department of Primary Industries and Regional Development whether there is a need to design and conduct a baseline survey in accordance with the guidelines provided by the Australian National System for the Prevention of Marine Pest Incursions”

After meeting with yourself and other representatives of Subsea 7 and discussing the proposed development and its potential introduced marine pest risk the Department agreed that a risk assessment of the IMP likelihood and likely introduction pathways was necessary. Subsea 7 contracted Biofouling Solutions to undertake this assessment. The

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Department is satisfied with the assessment conducted by Biofouling Solutions and that the identified biosecurity measures being taken by Subsea 7 with regards vessel management and vessel hygiene are sufficient to reduce any likelihood of introduction or spread to as low as reasonably practicable.

The Department have evaluated what is known of the Exmouth gulf region and its marine pest risk and do not see the need for any large-scale baseline survey of the Gulf. Given the relatively undisturbed nature of the Gulf and the minimal interaction with international vessels the likelihood of an introduced marine pest existing and remaining undetected is low. The only known introduced marine pest in that region is *Didemnum perlucidum*, a colonial ascidian that exists on most infrastructure along the Western Australian coastline.

Yours sincerely

A handwritten signature in blue ink that reads "Justin McDonald". The signature is written in a cursive, flowing style.

Dr Justin McDonald
**Principal Scientist and Manager Aquatic Pest Biosecurity
Sustainability and Biosecurity**