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 Contact: Qualified Firefighter Nathan Everett

24 October 2018

Department of Planning and Environment
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 Sydney NSW 2001

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Dear Ms Burn

**Notice of Exhibition
 Modification to the Shoalhaven Starches Facility
 160 Bolong Road, Bomaderry (Shoalhaven LGA)**

I refer to the submission of the Notice of Exhibition (the Notice) dated 19 September 2018 for the above development to Fire + Rescue NSW (FRNSW) for review and comment. It is understood that the Notice is in regard to the modification of the Shoalhaven Starches Facility, specifically the construction of; a third flour mill, an industrial process building, various additional plant, and a coal-fired co-generation plant. An Environmental Assessment report (the Report) including a number of accompanying annexures has been prepared in support of the modification.

Details of the submitted report are:

- Environmental Assessment – Modification Application Pursuant to Section 4.55(2) of the Environmental Planning & Assessment Act 1979, prepared by Toni Wearne of Cowman Stoddart Pty Ltd for Shoalhaven Starches Pty Ltd, report title: Proposed Modification to Project Approval MP 06_0228 Shoalhaven Starches Expansion Project. Proposed New Specialty Product Processing Facility, New Gluten Dryer and other associated works, dated 14 June 2018, Final Version, report reference 17/96

It has been the experience of FRNSW that large process and manufacturing facilities pose unique challenges to firefighters when responding to and managing an incident. Factors such as high and potentially hazardous fuel loads, facility layout, and design of fire safety systems have a significant impact on the ability to conduct firefighting operations safely and effectively. Consultation with organisations such as FRNSW throughout the development process enables the design and implementation of more effective fire safety solutions that help to mitigate the impact of incidents when they occur.



The following comments are provided following a review of the Report.

- The Preliminary Hazard Analysis (PHA) Annexure 4 report that has been completed in accordance with the HIPAP *Hazards-Related Assessment Process* makes no reference to HIPAP 2 or the undertaking of a Fire Safety Study (FSS) as part of the post-approval and pre-construction process.

The following recommendations are provided following a review of the Report.

- That a FSS be prepared in consultation with and to the satisfaction of FRNSW. The study should be in accordance with HIPAP 2 with consideration given to the requirement outlined within the guideline relating to "Where development involves the extension or substantial modification of an existing facility, the study should be set in the context of the fire hazard and systems for the entire site." Whether such modifications to the facility qualify should be at the discretion of the Department of Planning & Environment.

For further information please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS18/2723. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely



Superintendent Mick Henly
Manager Infrastructure Liaison Unit
Community Safety Directorate