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Contact: Leading Firefighter Timothy Wilson

6 December 2021

Lander Robinson
NSW Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 5022

Dear Lander Robinson

Re: Comment on Environmental Impact Statement (EIS) – Eraring Battery Energy Storage System (SSD-15950052)

Fire & Rescue NSW (FRNSW) acknowledge correspondence received on 17 November 2021, requesting input into the preparation of the EIS for the Eraring Battery Energy Storage System (BESS) (SSD-15950052).

In relation to the BESS, specifically, Lithium-ion batteries, such fires involving Lithium-ion batteries present unique risks to attending firefighters. The recommendations below reflect these risks.

FRNSW have reviewed the EIS and make the following recommendations:

1. To ensure that the fire prevention, detection, protection and firefighting measures are appropriate to the specific fire hazards and adequate to meet the extent of potential fires, a comprehensive Fire Safety Study (FSS) is recommended to be undertaken.
2. That the FSS is developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper No.2 (HIPAP No.2).
3. That the FSS is required to be developed in consultation with FRNSW and to the satisfaction of the operational requirements of FRNSW. FRNSW recommend that the development of a FSS be a condition of consent.
4. That the development of the FSS considers the operational capability of local fire agencies and the need for the facility to achieve an adequate level of on-site fire and life safety independence.
5. FRNSW preference is to review the Preliminary Hazards Analysis (PHA) report as this will determine the approach and design of the recommended fire safety study.

6. Should a fire or hazardous material incident occur, it is important that first responders have ready access to information which enables effective hazard control measures to be quickly implemented. Without limiting the scope of the Emergency Response Plan (ERP), the following matters are recommended to be addressed:
- a. That a comprehensive ERP is developed for the site.
 - b. That the ERP specifically addresses foreseeable on-site and off-site fire events and other emergency incidents, (e.g. fires involving solar panel arrays, bushfires in the immediate vicinity or potential hazardous material incidents).
 - c. That the ERP detail the appropriate risk control measures that would need to be implemented in order to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards). Such measures would include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures, minimum evacuation zone distances and a safe method of shutting down and isolating the photovoltaic system (either in its entirety or partially, as determined by risk assessment).
 - d. Other risk control measures that may need to be implemented in a fire emergency due to any unique hazards specific to the site should also be included in the ERP.
 - e. That two copies of the ERP (detailed in recommendation 6 (a) above) are stored in a prominent 'Emergency Information Cabinet' which is located in a position directly adjacent to the site's main entry point/s.

For further information please contact the Operational Liaison and Special Hazards Unit, referencing FRNSW file number BFS21/4710. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely



Superintendent John Hawes
Manager
Operational Liaison Special Hazards Unit

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