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TRIM Doc. No: D22/100380  
Contact: Station Officer Luke Loseby

17 November 2022

KARL OKORN  
NSW Department of Planning and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Dear Karl,

**Re: Advice on Environmental Impact Statement (EIS) – WARATAH SUPER BATTERY ENERGY STORAGE SYSTEM – MUNMORAH (SSI-48492458)**

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on the 10 November 2022, requesting advice on the EIS for WARATAH SUPER BATTERY ENERGY STORAGE SYSTEM – MUNMORAH (SSI-48492458). FRNSW have reviewed the EIS along with the Preliminary Hazards Analysis (PHA).

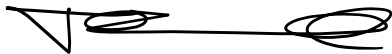
It has been the experience of FRNSW that BESS facilities pose special problems of firefighting and special hazards exist that may require additional fire safety and management measures. Due to these unique challenges FRNSW make the following recommendations:

1. That a comprehensive Fire Safety Study (FSS) is developed. The FSS is to be developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No.2<sup>1</sup> and is to meet the operational requirements of FRNSW.
2. That the development of the FSS consider 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. The FSS should consider worst-case fire scenarios including a full BESS unit fire and demonstrate no fire propagation within the facility.
3. That the FSS be submitted, reviewed, and meet the operational requirements of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ).
4. That the development of a FSS be a condition of consent.
5. That a comprehensive ERP is developed for the site in accordance with HIPAP No.1.<sup>2</sup> The findings of the FSS should inform the development and content of the ERP.

6. That an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.<sup>3</sup>
7. An Emergency Responders Induction Package is developed for the site in consultation with, and to the satisfaction of FRNSW prior to commissioning of the site. The package should inform first responders of site-specific features and safety measures to ensure they are able to undertake their duties effectively in accordance with agency specific Standard Operational Guidelines. The format of the Induction Package should be such that it can be readily shared across all Agencies.

For further information please contact the Operational Liaison and Special Hazards Unit, referencing FRNSW file number BFS22/5829. Please ensure that all correspondence in relation to this matter is submitted electronically to [firesafety@fire.nsw.gov.au](mailto:firesafety@fire.nsw.gov.au).

Yours sincerely



Superintendent James O'Carroll  
Manager  
Operational Liaison Special Hazards Unit

Cc: [karl.okorn@planning.nsw.gov.au](mailto:karl.okorn@planning.nsw.gov.au)

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<sup>1</sup> <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/fire-safety-study-guidelines-2011-01.pdf?la=en>

<sup>2</sup> <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/hazardous-industry-planning-advisory-paper-no-1-emergency-planning-2011-01.pdf?la=en>

<sup>3</sup> [https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines\\_ESIP\\_and\\_TFP.pdf](https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_ESIP_and_TFP.pdf)