

Ref: 2025/000380

10 July 2025

Ellen Luu  
Department of Planning, Housing and Infrastructure (DPHI)  
4PSQ, 12 Darcy Street Parramatta NSW 2150

---

**Re: Wagga Wagga Li-ion Battery Recycling Facility -SSD-67983064**

Dear Ellen,

I am writing to respond to the request for agency advice on 18 June 2025 regarding the proposed development of the Wagga Wagga Li-ion Battery Recycling Facility (SSD-67983064) to be located at 61 Edison Rd, Wagga Wagga NSW.

Upon review of the documents there appears to be only high-level detail provided on the hazards identified and the risk reduction control measures that are proposed to be implemented. As such our comments are limited to the following:

- (1) LPG storage vessels and/or associated equipment
  - a. Ensure that LPG installations comply with AS/NZS 1596.
  - b. Consider mechanical protection in the event of a catastrophic incident on site (e.g. earthen mound)
- (2) Ensure battery hazards are managed (e.g. Li-ion, Lead acid, NiCad) in particular:
  - a. Storage & handling of waste batteries – process input (e.g. manual handling, maximum storage capacity, segregation / separation distances)
  - b. Storage & handling of recovery materials – process output (e.g. manual handling, maximum storage capacity, segregation / separation distances)
  - c. Processing – managing the risks related to multiple operator work zones due to their interactions with various plant and/or equipment
- (3) Safety around fixed machinery and moving plant:
  - a. Traffic management plan
  - b. Regular inspection / Maintenance of plant
  - c. Adequate and effective energy isolation protocols

- d. Verification of worker competency
- (4) Preparation and submission of Emergency plans and notification of hazardous chemicals
  - a. Notification of hazardous chemicals on site to SafeWork NSW as per clause 347-348 of the Work Health & Safety Regulation 2017 (the Regulation)
  - b. Emergency plan to Fire & Rescue NSW, as per clause 361 of the Regulation
- (5) Compliance with the Code of Practice Managing the Risks of Hazardous Chemicals in the Workplace  
[https://www.safework.nsw.gov.au/\\_data/assets/pdf\\_file/0018/52155/Managing-risks-of-hazardous-chemicals-in-the-workplace-COP.pdf](https://www.safework.nsw.gov.au/_data/assets/pdf_file/0018/52155/Managing-risks-of-hazardous-chemicals-in-the-workplace-COP.pdf)

SafeWork NSW can provide further comments once a full hazard and risk assessment report and the documents listed in Section 10.1 “Recommendations” of the “Appendix I – Hazard and Risk report”, have been provided.

In the meantime, if you have any further questions, please contact Patrick Quinn on (02) 8867 2749 or email [Patrick.quinn@safework.nsw.gov.au](mailto:Patrick.quinn@safework.nsw.gov.au)

Sincerely,



**Andrew Battye**  
Director, Authorisations & Verifications