

Subject: **Objection to the Mangoplah Battery Energy Storage System – SSD-77527735.**

Because of ***The extreme risk of fire if construction to the Substation is not ceased during periods of Total Fire Ban.***

I am writing to formally express my objection to the Mangoplah Battery Energy Storage System (BESS) project proposed by Samsung C & T Renewable Energy Australia (SREA) Pty. Ltd., to be located within the property on 4178 Holbrook Road, Mangoplah. Because of ***The extreme risk of fire if construction to the Substation is not ceased during periods of Total Fire Ban.***

During a Total Fire Ban, according to the NSW Rural Fire Service “you cannot light, maintain or use a fire in the open, or to carry out any activity in the open that causes, or is likely to cause, a fire, including general purpose hot works (such as welding, grinding or gas cutting or any activity that produces a spark or flame) are not to be done in the open” (n.d.). So, all construction should be ceased to comply with the NSW Rural Fire Service. In addition the NSW Rural Fire Service also state that “Lighting a fire on a day of Total Fire Ban attracts an on the spot fine of \$2200. If the matter goes to court, you could be subject to a fine of up to \$5500 and/or 12 months gaol. Penalties for a fire that escapes and damages or destroys life, property or the environment can attract much greater fines and gaol terms with maximums at \$132,000 and/or 14 years gaol. Civil law suits can also be brought against the person responsible for a fire by those seeking compensation for losses sustained” (n.d.).

Moreover, during construction, there is a high risk of “sparks from construction machinery, vehicles or electrical works, or a fault occurring in the Proposal equipment (e.g. battery packs), start a fire, resulting in fire spreading onto the surrounding landscape and/or toxic chemicals/fumes being released” (p.251, Neoen, Territory Battery, EIS, 2024).

Furthermore, the Planning for Bushfire Protection “requires a Bush Fire Emergency Management and Operation Plan covering:

- Work that should not be carried out during total fire bans
- Detailed measures to prevent or mitigate fires igniting.
- Notification to the local RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation, proposed to be carries out during a bush-fire fire danger period...(p.123, Mangoplah EIS, 2025).

The site of the proposed Mangoplah BESS project is within close vicinity to the village of Mangoplah and is surrounded by agricultural and grazing land and is classified as being in a ‘High Fire Prone Area’, according to the NSW Rural Fire Service, in addition the area around the proposed Mangoplah BESS project site is classified as being Category 1 and 3 vegetation, as stated by Ember Consulting Pty. Ltd. (p.19, Bushfire Assessment Report, 2025), with “Vegetation Category 1 is considered to be the highest risk for bushfires...” and “Vegetation Category 3 is regarded as a medium vegetation...” (p.19, Bushfire Assessment Report, 2025), which according to the NSW Rural Fire Service requires a buffer zone of 30 metres, whereas the Mangoplah BESS Scope Report states that there will be an Asset Protection Zone of only 11 metres, while in a report by SLR Consulting Australia (SLR) for the Jindera BESS recommends a APZ of “30 metres from nearest BESS Site equipment”(p.26, Appendix J, Bushfire Assessment Report, 2025), along with an additional 30 metres required from the edge of vegetation. These inconsistencies with the required Asset Protection Zones are of major concern and need to be addressed and made uniform and become part of the Policies and/or Standards for all Battery

Energy Storage System (BESS) sites across Australia, especially those in New South Wales and in High Fire Prone Areas.

Furthermore, there should be a 100 meter Buffer Zone around the entire Mangoplah BESS project site, because of the close proximity to *“hazardous woodland vegetation”*, as per photos iii and vi (p.27, Ember Bushfire Consulting, Bushfire Assessment Report, 2025).

As stated by Australian Bushfire Protection Planners Pty. Limited, *“The BESS proposal is classified as ‘industrial’ development and...therefore, the default position for providing protection for ‘industrial’ development located in a bushfire prone area is to provide a defensible space (Asset Protection Zone) wide enough to prevent flame contact on the structure, or in the case of the BESS, the cabinets housing the battery packs and the electrical equipment in the Substation”* (p.24, Bushfire Risk Assessment Report, TBESS, 2023).

In addition, as stated by Ember Bushfire Consulting, *“Bushfire protection measures generally serve a dual purpose: protecting the site from external fire threats, containing fire within the site should it occur, and stopping it from escaping onto adjoining lands”* (p.32, Bushfire Assessment Report, 2025). Moreover, Ember Bushfire Consulting state *“Given the heat-sensitive nature of the Mangoplah BESS substation and associated infrastructure, larger APZ and setback dimensions are recommended than those prescribed...”*(p.32, Bushfire Assessment Report, 2025).

More controversial however, is the fact that the Environmental Impact Statement states *“the Project is deemed capable of complying with the specific and broad objectives of PBP through providing a range of bushfire protection measures that address the potential bushfire threat and requirements of PBP”* (p.128,2025), which include:

- affording structures protection from exposure to a bushfire,
- provide for a defensible space,
- provide appropriate separation between a hazard and structures to prevent the likely spread of fire,
- ensure that appropriate operational access and egress for
- emergency service personnel is available,
- provide for ongoing management and maintenance of BPMs and
- ensure that utility services are adequate to meet the needs of firefighters.

The Projects capabilities are questionable as mentioned throughout this letter, from the defensible space, separation between hazards, but more worrying is the fact that no local Rural Fire Service members will be in the vicinity of the proposed Mangoplah BESS or Substation site, as they are volunteers who are not directly paid for their time, and are not volunteers to sacrifice their lives to protect the proposed Mangoplah BESS and Substation in the event of a fire occurring near or within the area.

With the majority bushfires in the area typically ignited by lightning strikes and sparks from power lines during hot windy conditions, and with the bushfire season generally runs from October to March, depending on seasonal conditions (p.126, Deniliquin BESS, 2024), it is a period of non-complacency, a period in which landholders are alert to the dangerous weather conditions. Moreover, according to Vic Emergency *“Bushfires and grassfires start quickly, often without warning and they can threaten lives and properties within minutes”*, with them going onto say that *“grassfires can be just as dangerous as bushfires – grass is the most predominant*

fuel type in Australia. It ignites very quickly, burns rapidly and can travel at speeds of up to 25 kilometres per hour”(Facts of Fire/Emergency Victoria, n.d.). Moreover, as stated in the Mangoplah BESS Bushfire Assessment Report that the Forest Fire Danger Index (FFDI) is rated at 80, (p.19, Ember Consulting Pty. Ltd., 2025), which according to the Australian Fire Danger Rating System is classified as “*Extreme*” stating to “*Take action now to protect life and property*” “*Fire will spread quickly and be extremely dangerous*”.

Furthermore, “*during a fire, embers can travel up to 40 kilometres ahead of a fire front...starting spot fires well ahead of the fire-front-often without warning*” (Facts of Fire/Emergency Victoria, n.d.). More concerning however is the fact that “*Flame temperatures can reach up to 1100°C and radiant heat fluxes high enough to vaporise vegetation, only adding speed to the scorching hot flames...so fires can spread and become out of control quickly*” (Facts of Fire/Emergency Victoria, n.d.). In addition, according to the Australian Bushfire Protection Planners Pty. Limited, “*a dangerous and damaging fire has the potential to occur when the following conditions prevail: continuous available fuel...exposure of vulnerable assets...a combination of weather conditions that generate a...grass fire danger index of Very High or greater...a fire in the landscape which is not effectively suppressed*”(p. 20, Bushfire Risk Assessment Report, TBESS, 2023). As a result of these hot dry windy conditions, it is possible that a bushfire has the ability to, and is “*likely to impact on the BESS site...and the “fire is likely to over-run the site*” (p. 20, Australian Bushfire Protection Planners Pty. Limited, Bushfire Risk Assessment Report, TBESS, 2023

Furthermore, in the Bushfire Assessment Report, for Mangoplah BESS, it states that “*it is a SEARs requirement that the location of a electricity generating infrastructure, including BESS, should avoid any land subject to identified natural hazards (such as bushfires) and should not contribute to an increase of a natural hazard (bushfire)*” (p.19, Ember Bushfire Consulting, 2025).

The NSW Rural Fire Service, also states that the proposed Mangoplah BESS project site is located within a Priority 2 area, which prioritizes firefighter safety, then people, then property, then the environment, and finally restoring normality. This means that when responding to an incident, the safety of firefighters is paramount, followed by the protection of human life, and then the protection of structures and other assets.

Despite there being 3 Rural Fire Service Stations around the area ranging in distance from 2.5km to 22km away from the Mangoplah Bess site, it can take approximately 1 hour to manage to get a crew together to man even one tanker, this is due to the Fire Captain not being notified of an incident, the Fire Captain not able to be notified because of being in a ‘blackspot’ mobile phone area, or other rural fire members not able to attend the fire, as they also cannot be contacted.

Fire Risk and Safety is of major concern in the event of a fire occurring near or within the proposed Mangoplah BESS project site, but also as being a trained fire fighter, I feel that there is not only from the potential threat of a bushfire, but also the treat of thermal runaway and release of toxic chemicals into the air affecting the village of Mangoplah, the surrounding farmland, crops and livestock, but also leaking into the local waterways and creeks, in the event that a bushfire would over-run the proposed Mangoplah BESS project site.

It deeply affects and concerns me being the 6th generation on our family property, which was one of the first farming families to settle in the Mangoplah district many years ago, but that a rural community like Mangoplah is being exposed to this degree of risk and being impacted so

heavily. Please consider the fire risk and the added pressure posed to the local Rural Fire Service members and the broader community. In addition, changing the land use from farming to industrial will negatively impact Mangoplah's rural setting and lifestyle. Please consider the cost to the Mangoplah community – their environment, their safety, their homes and many farming families who have been here for generations will all be at increased risk if the proposed Mangoplah BESS project goes ahead.