

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

Because of an **Increased risk of fire from bushfire encroaching on the Mangoplah BESS then further migrating onto surrounding farmland resulting in major insurance problems for the landholders.**

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 an **Increased risk of fire from bushfire encroaching on the Mangoplah BESS then further migrating onto surrounding farmland resulting in major insurance problems for the landholders.**

The site is within close vicinity to the village of Mangoplah and is surrounded by agricultural and grazing land – to me it is not a place to build such a project.

There is growing concern by the landholders in the immediate vicinity of the proposed Mangoplah BESS project in the event of a bushfire encroaching upon the Mangoplah BESS and adjacent substation, which in turn further develops into a larger uncontrollable fire, which may further migrate onto the surrounding farmland.

This concern is enhanced by the probability of not having the appropriate or enough insurance coverage for the loss of crops, pasture, stock, sheds, homes and machinery. The main question being, could the bushfire have been contained or extinguished before it reached the proposed Mangoplah BESS and substation site, if not because of lack of available Rural Fire Service members available, or inadequate buffer zone and asset protection zone area around the surrounding Mangoplah BESS and substation area, or the water suppression system either not working or inadequate.

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).

As, “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 degrees Celsius 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).

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.

Farmers in Australia need a variety of insurance types, which combines coverage for property, machinery, and livestock, and specialised policies like crop, liability, and workers' compensation. Key policies include protecting buildings and contents, insuring machinery and vehicles, covering financial losses from crop failure or livestock death, and providing liability protection against claims from third-party injury or property damage.

Most farmers have a \$20 million public liability insurance policy can cost approximately \$84 to \$91 per month on average, or \$1,500 to \$2,200 per year for a business with an annual turnover over \$250,000. The final price varies significantly based on your specific business, with factors like annual turnover, industry, and risk profile impacting the premium.

As stated by the Insurance Council of Australia “the expansion” of renewable energy projects “across regional Australia presents a growing trend of landholders either hosting or neighbouring energy infrastructure” (Farm Insurance and Energy Infrastructure, 2024).

More concerning for the landholders or a contractor in close vicinity to the proposed Mangoplah BESS and substation projects in the event of a fire accidentally occurring on their property, and migrated to the proposed Mangoplah BESS and substation site, such as machinery accidentally hitting a rock in the paddock, that might have been there for a long time, would be catastrophic, as most landholders and contractors, currently have an insurance coverage of a maximum of \$20 million, which would not cover the cost of such a project as the Mangoplah BESS, which according to the Mangoplah BESS Environmental Impact Statement is ~ \$165 million (p.36, 2025), the landholders or contractors insurance would be totally inadequate, which would only force the landholder or contractor into bankruptcy, forcing them to sell their land for lower than current market value, just to help cover these enormous costs.

In a report by the NSW Agriculture Commissioner, in 2022, on Renewable energy generation and agriculture in NSW's rural landscape, states that “project applicants in the renewable energy sector should cover any additional public liability insurance costs incurred by neighbouring landholders because of proximity and risk to new energy facilities. In cases where suitable insurance cannot be obtained, the applicant should indemnify the neighbour for reasonable risk in relation to typical public liability cover” (p.1).

As a member of a long-established farming family that has been in the district for 4 generations, it deeply affects and concerns me that a rural community like Mangoplah is being exposed to this degree of risk and being impacted so heavily. Please consider the fire risk to the broader community and the added pressure posed to the local Rural Fire Service members, which I am a serving member and my father had been a long-standing Fire Captain in the area for many years and has seen and dealt with many fires and accidents that have occurred in the surrounding area. In addition, changing the land use from agricultural farming land 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.

Hazardous woodland vegetation – photos from pages iii and vi (p.27, Ember Bushfire Consulting, Bushfire Assessment Report, 2025)

