

Rob Beckett

From: Brendan.M Hurley [REDACTED]
Sent: Friday, 14 February 2020 11:15 AM
To: Rob Beckett
Cc: Fire Safety; John Hawes
Subject: Maxwell Solar Farm - SSD 9820

Maxwell Solar Farm - SSD 9820

Dear Rob,

I refer to the submission of the request for agency input into development of Environmental Impact Statement (EIS), dated 4th February 2020, for the above development to Fire & Rescue NSW (FRNSW). The relevant parts of the proponent's Environmental Impact Statement (EIS) have been reviewed and the following comments are submitted for consideration.

Large scale solar farm developments are usually located within NSW Rural Fire Services' (RFS) fire districts. Notwithstanding, in the event of either a significant fire event or hazardous material incident (hazmat), FRNSW will be responded to either assist the RFS or to fulfill the role of the designated hazmat combat agency.

It is FRNSW experience that large-scale photovoltaic installations and associated battery energy storage solutions (BESS) present unique hazards and risks to our personnel when fulfilling their emergency duties. It is highlighted that the Fire and Rescue NSW Act 1989 (the Act) imposes specific statutory functions and duties upon the Commissioner of FRNSW. Clause 5A of the Act requires the Commissioner to take all practicable measures for preventing and extinguishing fires and protecting and saving life and property within a FRNSW fire district. Clause 5A of the Act also requires the Commissioner to protect and save life and property endangered by hazmat incidents and for confining a hazmat incident and for rendering the hazmat site safe.

In addition, the Work Health and Safety (WHS) Act 2011 (and its subordinate Regulation) classify FRNSW as a person (entity) conducting a business or undertaking (PCBU). Clauses 34 and 35 of the WHS Regulation impose specific obligations upon a PCBU to identify hazards and manage risks at workplaces. A site involved in fire or hazmat incident is deemed to be a FRNSW place of work.

Due to the electrical and fire hazards associated with large scale photovoltaic installations and the potential risk to the health and safety of firefighters, both FRNSW and the NSW Rural Fire Service must be able to implement effective and appropriate risk control measures when managing an emergency incident at the proposed site.

FRNSW reaffirms previous recommendations FRNSW provided following the review of the SEARs regarding an emergency response plan for the site and as a Condition of Consent that a Fire Safety Study (FSS) be prepared for the BESS part of the site and submitted to FRNSW for review and determination. The FSS should be developed in consultation with and to the satisfaction of FRNSW.

For further information please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS20/316. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Regards
Brendan



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PREPARED FOR ANYTHING.

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