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Contact: Station Officer Graeme Turnbull

18 June 2018

The Department of Planning & Environment
C/- Georgia King
GPO Box 39
SYDNEY NSW 2001

georgia.king@planning.nsw.gov.au

Dear Georgia King

**Secretary's Environmental Assessment Requirements (SEARs)
Gregadoo Solar Project (SSD8825)
Boiling Down Road, Wagga Wagga (Wagga Wagga City Council)**

I refer to the above development application Environmental Impact Statement (EIS). Fire & Rescue NSW (FRNSW) have reviewed aspects of the EIS and the following comments and recommendations are submitted to the Department of Planning & Environment NSW for consideration.

The facility's proposed location is within a NSW Rural Fire Services' (RFS) Fire District. Notwithstanding, in the event of a significant fire event (either on or off-site in close proximity to the development) or hazardous material incident FRNSW will be responded to either assist the RFS or to fulfill the role of designated combat agency.

It is FRNSW experience that small and large scale photovoltaic installations present unique electrical hazard risks to our personnel when fulfilling their emergency first responder role (n.b. the Fire Brigades Act 1989 imposes specific statutory functions and duties upon the Commissioner of FRNSW).

In addition, the Work Health and Safety (WHS) Act 2011 (and its subordinate Regulation) classify FRNSW as an 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.

Due to the electrical 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.



Recommendation/s

Should a fire or hazardous material incident occur, it is important that first responders have ready access to information which enables effective control measures to be quickly implemented. Without limiting the scope of the emergency response plan (ERP), the following matters are recommended to be addressed:

1. That a comprehensive ERP is developed for the site.
2. That the ERP specifically addresses foreseeable on-site and off-site fire events and other emergency incidents, (e.g. fires involving solar panel arrays, bushfires in the immediate vicinity or potential hazmat incidents).
3. That the ERP detail the appropriate risk control measures that would need to be implemented in order to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards). Such measures would include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures, minimum evacuation zone distances and a safe method of shutting down and isolating the photovoltaic system (either in its entirety or partially, as determined by risk assessment).
4. Other risk control measures that may need to be implemented in a fire emergency due to any unique hazards specific to the site should also be included in the ERP.
5. That two copies of the ERP (detailed in recommendation 1 above) be stored in a prominent 'Emergency Information Cabinet' which is located in a position directly adjacent to the site's main entry point/s.
6. Once constructed and prior to operation, that the operator of the facility make contact with the relevant local emergency management committee (LEMC). The LEMC is a committee established by virtue of Section 28 of the State Emergency and Rescue Management Act 1989. LEMCs are required to be established so that emergency services organisations and other government agencies can proactively develop comprehensive inter agency local emergency procedures for significant hazardous sites within their particular local government area. The contact details of members of the LEMC can be obtained from the relevant local council.

For further information please contact Station Officer Graeme Turnbull of the Fire Safety Command Liaison Unit, referencing FRNSW file number BFS18/1021 (8000003306). Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Michael Gibson', with a stylized flourish at the end.

A/Superintendent Michael Gibson
A/Manager
Fire safety Command Liaison Unit

