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Contact: Senior Firefighter Lachlan Haar

13 October 2021

Mr Shaun Williams  
NSW Department of Planning, Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 5022

Dear Mr Williams

**Re: Comment on Environmental Impact Statement (EIS) for Snack Brands Manufacturing Facility (SSD-18204994).**

Fire & Rescue NSW (FRNSW) acknowledge correspondence received on 13 September 2021, requesting input into the preparation of the EIS for the Snack Brands Manufacturing Facility (SSD-18204994).

FRNSW have reviewed the EIS and make the following recommendations:

It has been the experience of FRNSW that large warehouse facilities pose unique challenges to firefighters when responding to and managing an incident. Factors such as potentially high fuel loads, facility layout, and design of fire safety systems have a significant impact on the ability to conduct firefighting operations safely and effectively. Consultation with organisations such as FRNSW throughout the development process enables the design and implementation of more effective fire safety solutions that help to mitigate the impact of incidents when they occur.

The following notes and comments are provided following a review of relevant parts of the Report and appendices.

- The existing warehouse facility has an automated high bay racking system installed. Such systems represent unique challenges to firefighting operations due to the height and density of stored goods, and limited access.

The following recommendations are provided following a review of relevant parts of the Report and appendices.

- Consideration be given as to whether the quantity of materials stored in the warehouse would be deemed a special hazard in regard to parts E1.10 and E2.3 of the NCC.
- Consultation with FRNSW be undertaken by way of the Fire Engineering Brief Questionnaire (FEBQ) process prior to the issue of the relevant construction certificate.

- Consideration be given to FRNSW access and intervention within the warehouse, particularly at heights above ground level or at heights beyond the reach of the equipment carried by the FRNSW for internal intervention. Suitable provisions should be made due to the nature in which the materials are stored within the automated portion pursuant to part E1.10 of the NCC such that there is access provided to all parts of the racking system in compliance with the Work Health and Safety provisions. FRNSW does not consider access via roof hatches etc. to be adequate to enable sufficient access to all areas of an automated system.
- Consideration be given to provision of adequate hydrant and hose reel coverage to all areas of the warehouse with details provided in the FEBQ/FER. Should it be deemed necessary to install additional hydrants internally within the warehouse, FRNSW will need to be consulted as to the proposed locations before support is provided.

For further information please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS21/3361. Please ensure that all correspondence in relation to this matter is submitted electronically to [firesafety@fire.nsw.gov.au](mailto:firesafety@fire.nsw.gov.au).

Yours sincerely



Superintendent John Hawes  
Manager  
Fire Safety Operational Liaison Unit

Cc: [shaun.williams@planning.nsw.gov.au](mailto:shaun.williams@planning.nsw.gov.au)